

THE PROPOSED REZONING AND SUBDIVISION OF PORTION 16 OF FARM KLEIN DASSENBERG 20 FOR THE DEVELOPMENT OF A SHOPPING CENTRE IN ATLANTIS, CAPE TOWN

PRE-APPLICATION BASIC ASSESSMENT REPORT

JULY 2025

DEA&DP REF: 16/3/3/6/7/1/A1/2/3077/24

EXECUTIVE SUMMARY

1. Introduction

ECOS Consulting (Pty) Ltd was appointed by Velaskar Property Development (Pty) Ltd, the Applicant, to undertake a basic environmental assessment process in terms of the National Environmental Management Act (Act 107 of 1998), as amended ("NEMA"), and the 2014 Environmental Impact Assessment ("EIA") Regulations (as amended) for the proposed rezoning and subdivision of Portion 16 of Farm Klein Dassenberg No. 20 for the development of a shopping centre, situated in Atlantis, Cape Town.

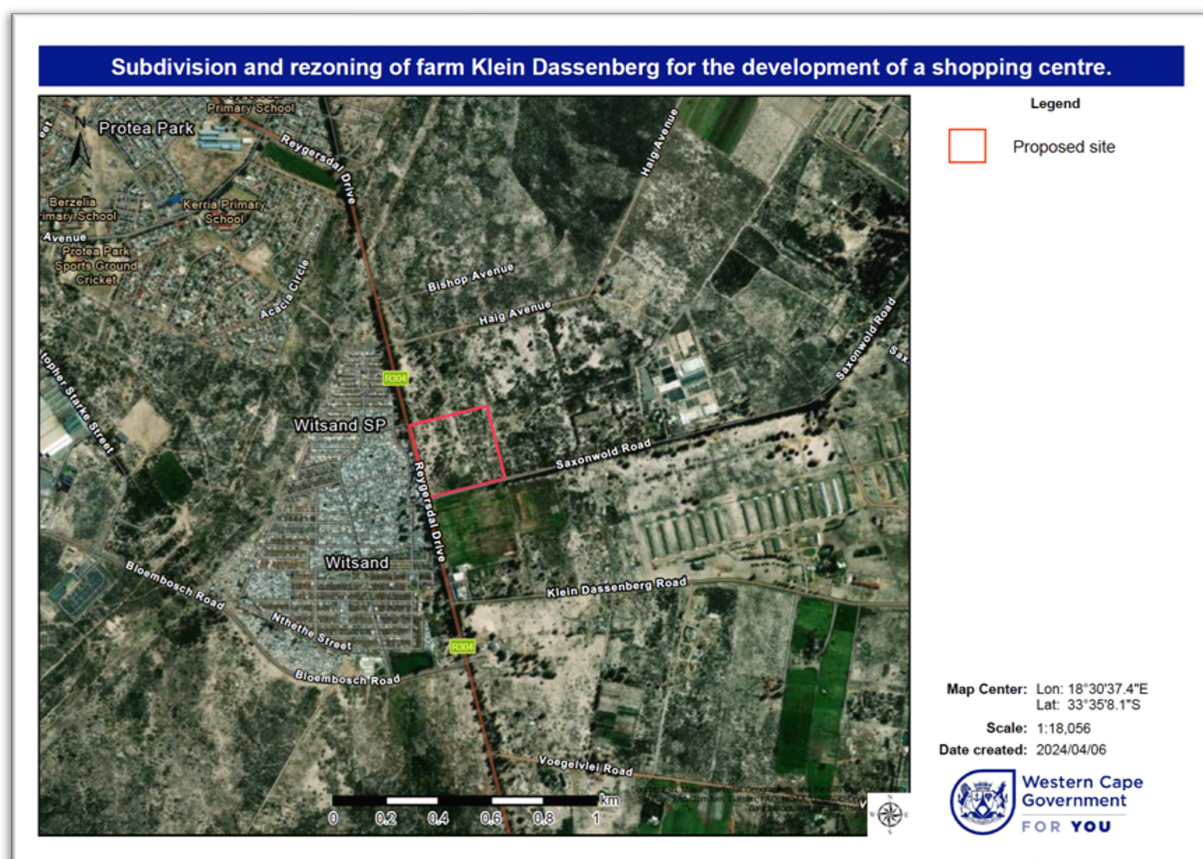


Figure 1: Locality Map

2. Description of the proposed development

The total extent of the site is approximately 8.6ha whilst the development footprint will cover an area of 1.7ha. The proposed development will be comprised of the following:

- Anchor shop;
- Various line shops;
- Parking area;
- ATMs, and;
- Delivery bays and yard areas.

See Figure 2: Site Development plan

Infrastructure for water, electricity, stormwater, and solid waste management will be developed as part of the shopping centre development.

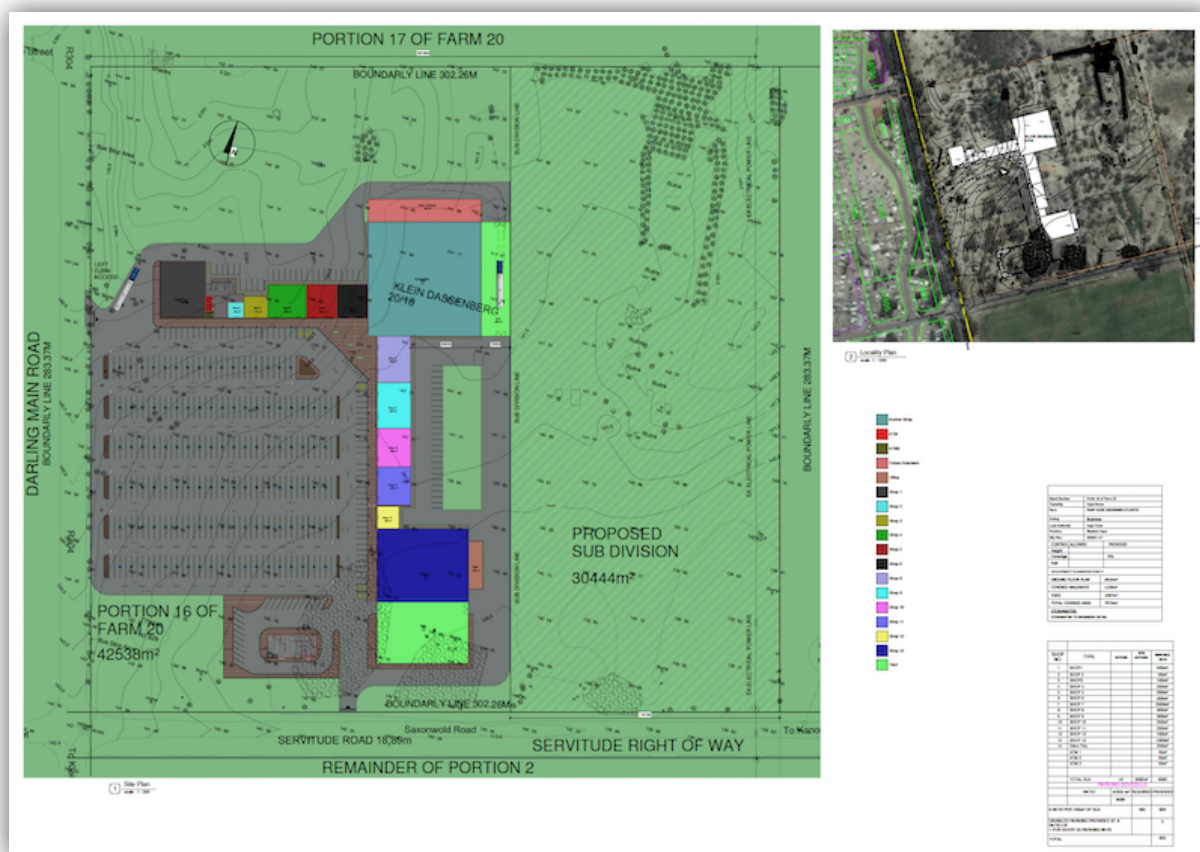


Figure 2: Site Development Plan

The property is currently zoned as "Agriculture". The rezoning of the property to "General Business 1" will allow for the development of the shopping centre. The property is located outside of the urban edge (City of Cape Town SDF) directly opposite the residential area of Witsand.

The following services are required:

Potable Water: Link services are required to connect to the existing water infrastructure at the Engen Garage on Klein Dassenberg Road.

Sewer Network: Linking to existing infrastructure through the construction of a raising main from the proposed development site to the gravity sewer main in Reygersdal Avenue.

Solid Waste: Waste will be collected by the municipality through the existing waste collection services.

Electrical: There is an existing 11kV feeder on the property, Dassenberg/Farmers 2, however it is currently constrained due to voltage violations. An application will be made to Eskom to explore the options available to address this.

Stormwater: There is no formal stormwater infrastructure in the vicinity of the proposed development. A Stormwater Management plan (SWMP) will be developed to manage the stormwater impacts of the proposed development and its effects.

Activities applied for:

| Activity No(s): | Listing Notice 1 |
|-----------------|---|
| 10 | <p>The development and related operation of infrastructure exceeding 1 000 metres in length for the bulk transportation of sewage, effluent, process water, waste water, return water, industrial discharge or slimes –</p> <ul style="list-style-type: none"> (i) with an internal diameter of 0,36 metres or more; or (ii) with a peak throughput of 120 litres per second or more; excluding where— <p>(a) such infrastructure is for the bulk transportation of sewage, effluent, process water, waste water, return water, industrial discharge or slimes inside a road reserve or railway line reserve; or</p> <p>(b) where such development will occur within an urban area.</p> <p>A sewer raising main linking to the gravity main would need to be constructed to meet the demand of the proposed shopping centre.</p> |
| 27 | <p>The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation, except where such clearance of indigenous vegetation is required for—</p> <ul style="list-style-type: none"> i. the undertaking of a linear activity; or ii. maintenance purposes undertaken in accordance with a maintenance management plan. <p>The development requires the clearance of approximately 1.7ha of an area that was originally composed of Atlantis Sand Fynbos. In its current state, it is composed of approximately 95 % problem and alien plant species with no species of conservation concern found on the site.</p> |
| 28 | <p>Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture, game farming, equestrian purposes or afforestation on or after 01 April 1998 and where such development:</p> <ul style="list-style-type: none"> (i) will occur inside an urban area, where the total land to be developed is bigger than 5 hectares; or (ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare; excluding where such land has already been developed for residential, mixed, retail, commercial, industrial or institutional purposes. |

| | |
|----|--|
| | <p>Farm Klein Dassenberg is located on the peri urban edge of Witsand, Atlantis and is currently zoned as Agriculture. The total area of the proposed development will be 17035m².</p> |
| | <p>Listing Notice 3</p> |
| 4 | <p>The development of a road wider than 4 metres with a reserve less than 13.5 metres -</p> <p>(i) <u>In Western Cape:</u></p> <p>ii. Areas outside of urban areas; (aa) Areas containing indigenous vegetation; ...</p> <p>The internal roads will be a minimum of 7,5 meters, which will be the aisle between the parking bays. All other streets will be approximately 5m wide. Streets for delivery vehicles will be approximately 6 m wide.</p> |
| 12 | <p>The clearance of an area of 300 square metres or more of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan.</p> <p>The proposed development is approximately 1.7ha in extent and will entail the clearing of more than 300m² of an indigenous vegetation classified as endangered.</p> <p>Though the vegetation is classified as endangered, the site is severely compromised, and very little indigenous vegetation remains. The site has largely been disturbed due to agricultural and other anthropogenic activities such as dumping of waste, an informal taxi rank and is overgrown with alien vegetation.</p> |

3. Specialist Inputs

The following specialist assessments was conducted during the environmental assessment process:

I. Biodiversity Assessment:

A biodiversity assessment as conducted by KC Phyto Enterprises. The following is noted:

- The vegetation is mapped as Atlantis Sand Fynbos and no longer exists in a pristine state.
- The ecosystem is in poor condition due to past farming activities and current disturbances (i.e. dumping, informal taxi rank located on the property, indiscriminate burning) therefore the remnant plant cover far is from representative of this vegetation type.
- No species of conservation concern was found.
- No faunal species of conservation concern was found
- No biodiversity constraints have been identified that would prevent the approval of the proposed development.

The proposed development is supported by the specialist. The specialist has recommended that an indigenous garden is established once development is complete.

II. Traffic Impact Assessment:

A traffic impact assessment was conducted by Imodie Projects. The following is noted:

- Traffic counts were undertaken to determine the existing Level of Service at 3 intersections and calculated the Level of Service with 2028 background traffic volumes and then traffic volumes with the proposed development.
- Based on the analysis conducted, Intersection 3 is currently experiencing capacity problems with LOS F being experienced on the western approach. All other intersections are operating at acceptable LOS.
- It is recommended that a traffic circle be implemented that will improve the LOS at intersection 3.
- The Traffic Assessment concludes that the pre- and post-development traffic impact is negligible.

III. Agricultural Assessment

Following an initial comment received from the City of Cape Town Spatial Planning and Environment Directorate and the proposed property identification as an "Area of Agricultural Significance", an Agricultural Assessment was conducted. The following is noted:

- The site is deemed as having a low agricultural potential with a "iv" land capability rating which implies marginal to moderately potential arable land.
- The project site is situated within the Atlantis Coastal Plain, which is characterized by sandy soils that are generally not suitable for agriculture.
- The availability of water within the greater Atlantis area is a limiting factor.
- Due to the lower average rainfall experienced in the Western Cape, the province in general is regarded as very limited in respect to its grazing capacity or the ability for the land to sustainably undertake stock farming. The size of the property also limits its ability to be used for stock farming.
- Farming on the site faces significant economic constraints, including soil limitations, limited irrigation, water availability, and the threat of land grabs, use as an informal taxi rank and the use of the site for illegal dumping.
- The site's agricultural value is low, and it is not considered a priority for preservation as agricultural land. Urban expansion onto the site is seen as inevitable and would not result in a significant loss of agricultural potential.

IV. Aquatic Compliance Statement

An Aquatic compliance statement was prepared by KC Phyto Enterprises. The following is noted:

- No wetlands nor distinct watercourses exist within the property boundary.
- Site soils were profiled and revealed no mottling of soils although some limited organics were found close to the soil surface (i.e. past site cultivation).
- No obligate wetland vegetation was found during the site ground-truth investigation.

It is recommended that:

- A geotechnical study should be conducted to inform the site structural development planning, and;
- A site stormwater management plan is developed to ensure that site drainage is formally controlled.

1. Alternatives

The Preferred alternative is for the development of the shopping centre and associated infrastructure (i.e. internal roads, sewer and potable water etc.). This will require the rezoning and subdivision of the property from 'Agriculture' to 'General Business 1' in terms of the City of Cape Town Municipal Planning Amendment Bylaw 2019.

No property/site, operational, or activity alternatives were considered for this application. The applicant who is the landowner wishes to develop the property as discussed above. Application will be made to rezone and subdivide the property.

The No -Go option will result in the status quo being maintained. This means that the property will remain fallow and will in all likelihood be vulnerable to land grabs and the continued use of the site as a dumping ground and informal taxi rank.

2. Identification of Impacts

The following impacts are likely to occur during the planning/design/development phase and the operational phase of the proposed development:

| PLANNING, DESIGN AND CONSTRUCTION PHASE | | |
|---|-------------------------|----------------------------|
| POTENTIAL IMPACT | SIGNIFICANCE RATING | |
| | WITHOUT MITIGATION | WITH MITIGATION |
| Biophysical aspects | | |
| Loss of agricultural land | Low | Not applicable |
| Loss of indigenous vegetation | Low negative | Very low to negligible |
| Loss of aquatic habitat | Low negative | Very low to negligible |
| Disturbance of faunal species | Low negative | Negligible |
| Loss of heritage resources | Low negative | Very low to negligible |
| Construction related aspects | | |
| Employment opportunities | Low | Low positive |
| Soil contamination | Low negative | Low negative to negligible |
| Dust nuisance | Low negative | Low negative to negligible |
| Waste management | Low negative | Low negative to negligible |
| Traffic flow | Low negative | Low negative |
| OPERATIONAL PHASE | | |
| Employment opportunities | Medium to High positive | N/A |
| Influx of traffic | High negative | Medium negative |
| Noise nuisance | Low negative | Low negative to negligible |
| Contaminated stormwater | Medium negative | Low negative |
| Contamination due to sewage leaks | Medium negative | Low negative |

3. Recommendations

Based on the assessment, the following recommendations are made:

- Implementation of all proposed mitigation measures to minimize environmental and social impacts.
- Continuous engagement with the local community to ensure their concerns are addressed and benefits maximized.
- Regular monitoring and reporting to ensure compliance with all regulatory requirements and mitigation measures.

4. Conclusion

The proposed development is not expected to have any significant impacts on the receiving environment. All impacts identified can be mitigated to acceptable levels of significance. Despite the classification of the site as a "An area of agricultural significance" according to the Municipal SDF, the site has been found to be of low agricultural value. The site is not able to sustain any form of agriculture.

The proposed development will contribute to the local economy, an improvement of infrastructure within the area and will create employment opportunities in an area that is sorely needed.

The construction phase impacts identified are primarily localized, short-term, and site-specific and pertaining to the construction phase of the development. The mitigation measures outlined in this Basic Assessment Report (BAR) and the accompanying Environmental Management Programme (EMPr) (Appendix H) will mitigate construction phase impacts, control noise and disturbance, and promote responsible environmental management practices.

TABLE OF CONTENTS

| | |
|--|---------------|
| SECTION A: ADMINISTRATIVE DETAILS..... | 20 |
| SECTION B: CONFIRMATION OF SPECIFIC PROJECT DETAILS AS INLCUDED IN THE APPLICATION FORM | 21 |
| SECTION C: LEGISLATION/POLICIES AND/OR GUIDELINES/PROTOCOLS | 29 |
| SECTION D: APPLICABLE LISTED ACTIVITIES | 32 |
| SECTION E: PLANNING CONTEXT AND NEED AND DESIRABILITY | 34 |
| SECTION F: PUBLIC PARTICIPATION | 39 |
| SECTION G: DESCRIPTION OF THE RECEIVING ENVIRONMENT | 41 |
| SECTION H: ALTERNATIVES, METHODOLOGY AND ASSESSMENT OF ALTERNATIVES. | 56 |
| SECTION I: FINDINGS, IMPACT MANAGEMENT AND MITIGATION MEASURES..... | 63 |
| SECTION J: GENERAL | 68 |
| SECTION K: DECLARATIONS..... | 73 |
| FIGURE 1: LOCATION OF FARM KLEIN DASSENBERG NO. 20, PORTION 16. | 22 |
| FIGURE 2: PROPOSED DESIGN OF THE SHOPPING CENTRE | 23 |
| FIGURE 3: SUBDIVISION PLAN NOTING WHERE THE DEVELOPMENT IS PLANNED | 24 |
| FIGURE 4: POTABLE WATER CONNECTION TO THE EXISTING LINE AT ENGEN GARAGE | 26 |
| FIGURE 5: FOUL SEWER CONNECTION | 27 |
| FIGURE 6: ZONING OF FARM KLEIN DASSENBERG 16/20 | 34 |
| FIGURE 7: VEGETATION TYPE ON THE PROPOSED SITE | 37 |
| FIGURE 8: BIODIVERSITY SPATIAL PLAN FOR THE PROPOSED DEVELOPMENT | 38 |
| FIGURE 9: PROPOSED UPGRADING OF THE SAXONWOLD/R304 INTERSECTION | 49 |
| FIGURE 10: LAND CAPABILITY MAP FOR THE STUDY SITE | 50 |
| FIGURE 11: STUDY SITE SOIL MAP WITH CONTOUR LINES (DUNE ON NORTHERN SITE EXTENT INDICATED AS 150M) | 51 |
| FIGURE 12: COMMON GREY DUNE SANDS PREDOMINANT LANDSCAPE UNIT FOUND ON THE SITE | 52 |
| FIGURE 13: GOOGLE EARTH TIMELINE IMAGE - FEBRUARY 2003 (HERDIEN 2023) | 53 |
| FIGURE 14: STUDY SITE ALIEN VEGETATION PRESENCE MODEL (HERDIEN 2023) | 53 |
| FIGURE 15: DUMPING AND BURNING NOTED ON SITE | 54 |
| FIGURE 16: SITE ACCESS (SEE WHITE BOX) FROM R304 (GATE 1) AND SAXONWOLD ROAD (GATE 2) | 57 |
| FIGURE 17 SHOWING THE GAPS (DEPICTED BY ARROWS) BETWEEN THE BLUE GUM TREES THAT WILL BE EXPLORED FOR ACCESS/EGRESS POINTS | 58 |



**Western Cape
Government**

Department of Environmental Affairs and
Development Planning

BASIC ASSESSMENT REPORT

THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) AND THE ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS.

APRIL 2024



BASIC ASSESSMENT REPORT

**THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) AND
THE ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS.**

APRIL 2024

| (For official use only) | |
|---|--|
| Pre-application Reference Number (if applicable): | |
| EIA Application Reference Number: | |
| NEAS Reference Number: | |
| Exemption Reference Number (if applicable): | |
| Date BAR received by Department: | |
| Date BAR received by Directorate: | |
| Date BAR received by Case Officer: | |

GENERAL PROJECT DESCRIPTION

(This must Include an overview of the project including the Farm name/Portion/Erf number)

**The proposed rezoning and subdivision of Portion 16 of the farm Klein Dassenberg No. 20
for the development of a shopping centre.**

IMPORTANT INFORMATION TO BE READ PRIOR TO COMPLETING THIS BASIC ASSESSMENT REPORT

1. **The purpose** of this template is to provide a format for the Basic Assessment report as set out in Appendix 1 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"), Environmental Impact Assessment ("EIA") Regulations, 2014 (as amended) in order to ultimately obtain Environmental Authorisation.
2. The Environmental Impact Assessment ("EIA") Regulations is defined in terms of Chapter 5 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") hereinafter referred to as the "NEMA EIA Regulations".

3. *Submission of documentation, reports and other correspondence:*

The Department has adopted a digital format for corresponding with proponents/applicants or the general public. If there is a conflict between this approach and any provision in the legislation, then the provisions in the legislation prevail. If there is any uncertainty about the requirements or arrangements, the relevant Competent Authority must be consulted.

The Directorate: Development Management has created generic e-mail addresses for the respective Regions, to centralise their administration. Please make use of the relevant general administration e-mail address below when submitting documents:

DEADPEIAAdmin@westerncape.gov.za

Directorate: Development Management (Region 1):
City of Cape Town; West Coast District Municipal area;
Cape Winelands District Municipal area and Overberg District Municipal area.

DEADPEIAAdmin.George@westerncape.gov.za

Directorate: Development Management (Region 3):
Garden Route District Municipal area and Central Karoo District Municipal area

General queries must be submitted via the general administration e-mail for EIA related queries. Where a case-officer of DEA&DP has been assigned, correspondence may be directed to such official and copied to the relevant general administration e-mail for record purposes.

All correspondence, comments, requests and decisions in terms of applications, will be issued to either the applicant/requester in a digital format via email, with digital signatures, and copied to the Environmental Assessment Practitioner ("EAP") (where applicable).

4. The required information must be typed within the spaces provided in this Basic Assessment Report ("BAR"). The sizes of the spaces provided are not necessarily indicative of the amount of information to be provided.
5. All applicable sections of this BAR must be completed.
6. Unless protected by law, all information contained in, and attached to this BAR, will become public information on receipt by the Competent Authority. If information is not submitted with this BAR due to such information being protected by law, the applicant and/or Environmental Assessment Practitioner ("EAP") must declare such non-disclosure and provide the reasons for believing that the information is protected.
7. This BAR is current as of **April 2024**. It is the responsibility of the Applicant/ EAP to ascertain whether subsequent versions of the BAR have been released by the Department. Visit this Department's website at <http://www.westerncape.gov.za> to check for the latest version of this BAR.
8. This BAR is the standard format, which must be used in all instances when preparing a BAR for Basic Assessment applications for an environmental authorisation in terms of the NEMA EIA Regulations

when the Western Cape Government Department of Environmental Affairs and Development Planning ("DEA&DP") is the Competent Authority.

9. Unless otherwise indicated by the Department, one hard copy and one electronic copy of this BAR must be submitted to the Department at the postal address given below or by delivery thereof to the Registry Office of the Department. Reasonable access to copies of this Report must be provided to the relevant Organs of State for consultation purposes, which may, if so indicated by the Department, include providing a printed copy to a specific Organ of State.
10. This BAR must be duly dated and originally signed by the Applicant, EAP (if applicable) and Specialist(s) and must be submitted to the Department at the details provided below.
11. The Department's latest Circulars pertaining to the "One Environmental Management System" and the EIA Regulations, any subsequent Circulars, and guidelines must be taken into account when completing this BAR.
12. Should a water use licence application be required in terms of the National Water Act, 1998 (Act No. 36 of 1998) ("NWA"), the "One Environmental System" is applicable, specifically in terms of the synchronisation of the consideration of the application in terms of the NEMA and the NWA. Refer to this Department's Circular EADP 0028/2014: One Environmental Management System.
13. Where Section 38 of the National Heritage Resources Act, 1999 (Act No. 25 of 1999) ("NHRA") is triggered, a copy of Heritage Western Cape's final comment must be attached to the BAR.
14. The Screening Tool developed by the National Department of Environmental Affairs must be used to generate a screening report. Please use the Screening Tool link <https://screening.environment.gov.za/screeningtool> to generate the Screening Tool Report. The screening tool report must be attached to this BAR.
15. Where this Department is also identified as the Licencing Authority to decide on applications under the National Environmental Management: Air Quality Act (Act No. 29 of 2004) ('NEM:AQA'), the submission of the Report must also be made as follows, for-
Waste Management Licence Applications, this report must also (i.e., another hard copy and electronic copy) be submitted for the attention of the Department's Waste Management Directorate (Tel: 021-483-2728/2705 and Fax: 021-483-4425) at the same postal address as the Cape Town Office.

Atmospheric Emissions Licence Applications, this report must also be (i.e., another hard copy and electronic copy) submitted for the attention of the Licensing Authority or this Department's Air Quality Management Directorate (Tel: 021 483 2888 and Fax: 021 483 4368) at the same postal address as the Cape Town Office.

DEPARTMENTAL DETAILS

| CAPE TOWN OFFICE: DIRECTORATE: DEVELOPMENT MANAGEMENT (REGION 1) (City of Cape Town, West Coast District, Cape Winelands District & Overberg District) | GEORGE REGIONAL OFFICE: DIRECTORATE: DEVELOPMENT MANAGEMENT (REGION 3) (Central Karoo District & Garden Route District) |
|---|--|
| <p>The completed Form must be sent via electronic mail to: DEADPEIAAdmin@westerncape.gov.za</p> <p>Queries should be directed to the Directorate: Development Management (Region 1) at: E-mail: DEADPEIAAdmin@westerncape.gov.za Tel: (021) 483-5829</p> <p>Western Cape Government Department of Environmental Affairs and Development Planning Attention: Directorate: Development Management (Region 1) Private Bag X 9086 Cape Town, 8000</p> | <p>The completed Form must be sent via electronic mail to: DEADPEIAAdmin.George@westerncape.gov.za</p> <p>Queries should be directed to the Directorate: Development Management (Region 3) at: E-mail: DEADPEIAAdmin.George@westerncape.gov.za Tel: (044) 814-2006</p> <p>Western Cape Government Department of Environmental Affairs and Development Planning Attention: Directorate: Development Management (Region 3) Private Bag X 6509 George, 6530</p> |

MAPS

| Provide a location map (see below) as Appendix A1 to this BAR that shows the location of the proposed development and associated structures and infrastructure on the property. | |
|---|---|
| Locality Map: | <p>The scale of the locality map must be at least 1:50 000. For linear activities or development proposals of more than 25 kilometres, a smaller scale e.g., 1:250 000 can be used. The scale must be indicated on the map. The map must indicate the following:</p> <ul style="list-style-type: none"> an accurate indication of the project site position as well as the positions of the alternative sites, if any; road names or numbers of all the major roads as well as the roads that provide access to the site(s) a north arrow; a legend; and a linear scale. <p>For ocean based or aquatic activity, the coordinates must be provided within which the activity is to be undertaken and a map at an appropriate scale clearly indicating the area within which the activity is to be undertaken.</p> <p>Where comment from the Western Cape Government: Transport and Public Works is required, a map illustrating the properties (owned by the Western Cape Government: Transport and Public Works) that will be affected by the proposed development must be included in the Report.</p> |
| Provide a detailed site development plan / site map (see below) as Appendix B1 to this BAR; and if applicable, all alternative properties and locations. | |
| Site Plan: | <p>Detailed site development plan(s) must be prepared for each alternative site or alternative activity. The site plans must contain or conform to the following:</p> <ul style="list-style-type: none"> The detailed site plan must preferably be at a scale of 1:500 or at an appropriate scale. The scale must be clearly indicated on the plan, preferably together with a linear scale. The property boundaries and numbers of all the properties within 50m of the site must be indicated on the site plan. On land where the property has not been defined, the co-ordinates of the area in which the proposed activity or development is proposed must be provided. The current land use (not zoning) as well as the land use zoning of each of the adjoining properties must be clearly indicated on the site plan. The position of each component of the proposed activity or development as well as any other structures on the site must be indicated on the site plan. Services, including electricity supply cables (indicate aboveground or underground), water supply pipelines, boreholes, sewage pipelines, storm water infrastructure and access roads that will form part of the proposed development must be clearly indicated on the site plan. Servitudes and an indication of the purpose of each servitude must be indicated on the site plan. Sensitive environmental elements within 100m of the site must be included on the site plan, including (but not limited to): <ul style="list-style-type: none"> Watercourses / Rivers / Wetlands Flood lines (i.e., 1:100 year, 1:50 year and 1:10 year where applicable); |

| | |
|--|--|
| | <ul style="list-style-type: none"> o Coastal Risk Zones as delineated for the Western Cape by the Department of Environmental Affairs and Development Planning ("DEA&DP"): o Ridges; o Cultural and historical features/landscapes; o Areas with indigenous vegetation (even if degraded or infested with alien species). <ul style="list-style-type: none"> • Whenever the slope of the site exceeds 1:10, a contour map of the site must be submitted. • North arrow <p>A map/site plan must also be provided at an appropriate scale, which superimposes the proposed development and its associated structures and infrastructure on the environmental sensitivities of the preferred and alternative sites indicating any areas that should be avoided, including buffer areas.</p> |
| Site photographs | <p>Colour photographs of the site that shows the overall condition of the site and its surroundings (taken on the site and taken from outside the site) with a description of each photograph. The vantage points from which the photographs were taken must be indicated on the site plan, or locality plan as applicable. If available, please also provide a recent aerial photograph. Photographs must be attached to this BAR as Appendix C. The aerial photograph(s) should be supplemented with additional photographs of relevant features on the site. Date of photographs must be included. Please note that the above requirements must be duplicated for all alternative sites.</p> |
| Biodiversity Overlay Map: | <p>A map of the relevant biodiversity information and conditions must be provided as an overlay map on the property/site plan. The Map must be attached to this BAR as Appendix D.</p> |
| Linear activities or development and multiple properties | <p>GPS co-ordinates must be provided in degrees, minutes and seconds using the Hartebeeshoek 94 WGS84 co-ordinate system.</p> <p>Where numerous properties/sites are involved (linear activities) you must attach a list of the Farm Name(s)/Portion(s)/Erf number(s) to this BAR as an Appendix.</p> <p>For linear activities that are longer than 500m, please provide a map with the co-ordinates taken every 100m along the route to this BAR as Appendix A3.</p> |

ACRONYMS

| | |
|----------|--|
| DAFF: | Department of Forestry and Fisheries |
| DEA: | Department of Environmental Affairs |
| DEA& DP: | Department of Environmental Affairs and Development Planning |
| DHS: | Department of Human Settlement |
| DoA: | Department of Agriculture |
| DoH: | Department of Health |
| DWS: | Department of Water and Sanitation |
| EMPr: | Environmental Management Programme |
| HWC: | Heritage Western Cape |
| NFEPA: | National Freshwater Ecosystem Protection Assessment |
| NSBA: | National Spatial Biodiversity Assessment |
| TOR: | Terms of Reference |
| WCBSP: | Western Cape Biodiversity Spatial Plan |
| WCG: | Western Cape Government |

ATTACHMENTS

Note: The Appendices must be attached to the BAR as per the list below. Please use a ✓ (tick) or a x (cross) to indicate whether the Appendix is attached to the BAR.

The following checklist of attachments must be completed.

| APPENDIX | | | ✓ (Tick) or x (cross) |
|-------------|--|---|---|
| Appendix A: | Maps | | |
| | Appendix A1: | Locality Map | ✓ |
| | Appendix A2: | Coastal Risk Zones as delineated in terms of ICMA for the Western Cape by the Department of Environmental Affairs and Development Planning | x |
| | Appendix A3: | Map with the GPS co-ordinates for linear activities | x |
| Appendix B: | Appendix B1: | Site development plan(s) | ✓ |
| | Appendix B2 | A map of appropriate scale, which superimposes the proposed development and its associated structures and infrastructure on the environmental sensitivities of the preferred site, indicating any areas that should be avoided, including buffer areas; | x |
| Appendix C: | Photographs | | ✓ |
| Appendix D: | Biodiversity overlay map | | ✓ |
| Appendix E: | Permit(s) / license(s) / exemption notice, agreements, comments from State Department/Organs of state and service letters from the municipality. | | |
| | Appendix E1: | Final comment/ROD from HWC | ✓ |
| | Appendix E2: | Copy of comment from Cape Nature | To be provided as this represents the Pre-App BAR |
| | Appendix E3: | Final Comment from the DWS | x |
| | Appendix E4: | Comment from the DEA: Oceans and Coast | N/A |
| | Appendix E5: | Comment from the DAFF | x |
| | Appendix E6: | Comment from WCG: Transport and Public Works | x |
| | Appendix E7: | Comment from WCG: DoA | x |
| | Appendix E8: | Comment from WCG: DHS | N/A |

| | | | |
|-------------|---|---|-----|
| | Appendix E9: | Comment from WCG: DoH | N/A |
| | Appendix E10: | Comment from DEA&DP: Pollution Management | N/A |
| | Appendix E11: | Comment from DEA&DP: Waste Management | x |
| | Appendix E12: | Comment from DEA&DP: Biodiversity | x |
| | Appendix E13: | Comment from DEA&DP: Air Quality | x |
| | Appendix E14: | Comment from DEA&DP: Coastal Management | N/A |
| | Appendix E15: | Comment from the local authority | ✓ |
| | Appendix E16: | Confirmation of all services (water, electricity, sewage, solid waste management) | ✓ |
| | Appendix E17: | Comment from the District Municipality | N/A |
| | Appendix E18: | Copy of an exemption notice | N/A |
| | Appendix E19 | Pre-approval for the reclamation of land | N/A |
| | Appendix E20: | Proof of agreement/TOR of the specialist studies conducted. | x |
| | Appendix E21: | Proof of land use rights | N/A |
| | Appendix E22: | Proof of public participation agreement for linear activities | N/A |
| Appendix F: | Public participation information: including a copy of the register of I&APs, the comments and responses Report, proof of notices, advertisements and any other public participation information as is required. | | ✓ |
| Appendix G: | Specialist Report(s) | | ✓ |
| Appendix H: | EMPr | | ✓ |
| Appendix I: | Appendix I1 | Screening tool report | ✓ |
| | Appendix I2 | Site Sensitivity Verification Report | ✓ |
| Appendix J: | The impact and risk assessment for each alternative | | ✓ |
| Appendix K: | Need and desirability for the proposed activity or development in terms of this Department's guideline on Need and Desirability | | ✓ |

| | | |
|-------------|--|---|
| | (March 2013)/DEA Integrated Environmental Management Guideline | |
| Appendix L: | Site Sensitivity verification report | ✓ |
| Appendix M: | Traffic Evacuation Model | ✓ |
| Appendix N: | Land Use Management Application | ✓ |

SECTION A: ADMINISTRATIVE DETAILS

| Highlight the Departmental Region in which the intended application will fall | CAPE TOWN OFFICE: REGION 1 | | GEORGE OFFICE: REGION 3 |
|--|---|---|--|
| | (City of Cape Town, West Coast District) | (Cape Winelands District & Overberg District) | (Central Karoo District & Garden Route District) |
| Duplicate this section where there is more than one Proponent Name of Applicant/Proponent: Name of contact person for Applicant/Proponent (if other): Company/ Trading name/State Department/Organ of State: Company Registration Number: Postal address: Telephone: E-mail: | Mr Hasanmiyan Ibrahim Velaskar | | |
| | Bradley Bordiss | | |
| | Velaskar Property Development (Pty) Ltd | | |
| | K2016069819 | | |
| | 92 Flat Road | | |
| | Rylands | | Postal code: 7764 |
| | () N/A | | Cell: 082 362 9324 |
| | newlook@telkomsa.net | | Fax: () N/A |
| | Company of EAP: ECOS Consulting (Pty) Ltd | | |
| | EAP name: Peter Harmse | | |
| Wiesaal Salaam | | | |
| Postal address: 106 Murray Street | | | |
| Goodwood | | | |
| () N/A | | 7460 | |
| Telephone: () N/A | | Cell: 073 4073674 | |
| E-mail: environmental@ecos-consulting.co.za | | | |
| Qualifications: Peter Harmse: B.Tech Environmental Health and National Diploma in Public Health | | | |
| Wiesaal Salaam: Postgraduate Diploma in Sustainable Development and a BSc Honours | | | |
| EAP registration no: Peter Harmse: 2019/797 Registered EAP | | | |
| Wiesaal Salaam: 2023/7434 Candidate EAP | | | |
| Duplicate this section where there is more than one landowner Name of landowner: Name of contact person for landowner (if other): Postal address: Telephone: E-mail: | N/A | | |
| | | | |
| | | | |
| | | | Postal code: |
| | () | | Cell: |
| | | | Fax: () |
| | | | |
| Name of Person in control of the land: Name of contact person for person in control of the land: Postal address: Telephone: E-mail: | Velaskar Property Development (Pty) Ltd | | |
| | Bradley Bordiss | | |
| | 92 Flat Road | | |
| | Rylands | | Postal code: 7764 |
| | () N/A | | Cell: 082 362 9324 |
| | newlook@telkomsa.net | | Fax: () |
| Duplicate this section where there is more than one Municipal Jurisdiction | City of Cape Town | | |
| | Blaauwberg | | |

| | | | |
|---|---|-------------------|--|
| Municipality in whose area of jurisdiction the proposed activity will fall: | | | |
| Contact person: | Ms Sonja Warnich-Stemmet, Head (North) | | |
| Postal address: | Milnerton Municipal Office, 87 Pienaar Road | | |
| Telephone | Milnerton | Postal code: 7435 | |
| E-mail: | (021) 444 0598 | Cell: | |
| | sonja.warnichstemmet@capetown.gov.za | Fax: () | |

SECTION B: CONFIRMATION OF SPECIFIC PROJECT DETAILS AS INCLUDED IN THE APPLICATION FORM

| | | | | | | | | | | | | | |
|---|---|---|------------------------------------|----|--|--|--|--|--|--|--|--|---------------------|
| 1. | Is the proposed development (please tick): | <input checked="" type="checkbox"/> New | <input type="checkbox"/> Expansion | | | | | | | | | | |
| 2. | Is the proposed site(s) a brownfield of greenfield site? Please explain. | | | | | | | | | | | | |
| The proposed development will be on a site considered a greenfield site. The property was previously used for agricultural purposes but has since become fallow. | | | | | | | | | | | | | |
| 3. | For Linear activities or developments | | | | | | | | | | | | |
| 3.1. | Provide the Farm(s)/Farm Portion(s)/Erf number(s) for all routes: | | | | | | | | | | | | |
| 3.2. | Development footprint of the proposed development for all alternatives: | | —m ² | | | | | | | | | | |
| 3.3. | Provide a description of the proposed development (e.g. for roads the length, width and width of the road reserve in the case of pipelines indicate the length and diameter) for all alternatives. | | | | | | | | | | | | |
| 3.4. | Indicate how access to the proposed routes will be obtained for all alternatives. | | | | | | | | | | | | |
| 3.5. | SG Digit codes of the Farms/Farm Portions/Erf numbers for all alternatives | | | | | | | | | | | | |
| 3.6. | Starting point co-ordinates for all alternatives | | | | | | | | | | | | |
| | Latitude (S) | ° | ' | '' | | | | | | | | | |
| | Longitude (E) | ° | ' | '' | | | | | | | | | |
| | Middle point co-ordinates for all alternatives | | | | | | | | | | | | |
| | Latitude (S) | ° | ' | '' | | | | | | | | | |
| | Longitude (E) | ° | ' | '' | | | | | | | | | |
| | End point co-ordinates for all alternatives | | | | | | | | | | | | |
| | Latitude (S) | ° | ' | '' | | | | | | | | | |
| | Longitude (E) | ° | ' | '' | | | | | | | | | |
| Note: For Linear activities or developments longer than 500m, a map indicating the co-ordinates for every 100m along the route must be attached to this BAR as Appendix A3. | | | | | | | | | | | | | |
| 4. | Other developments | | | | | | | | | | | | |
| 4.1. | Property size(s) of all proposed site(s): | | | | | | | | | | | | 85683m ² |
| 4.2. | Developed footprint of the existing facility and associated infrastructure (if applicable): | | | | | | | | | | | | N/A m ² |
| 4.3. | Development footprint of the proposed development and associated infrastructure size(s) for all alternatives: | | | | | | | | | | | | 17035m |
| 4.4. | Provide a detailed description of the proposed development and its associated infrastructure (This must include details of e.g. buildings, structures, infrastructure, storage facilities, sewage/effluent treatment and holding facilities). | | | | | | | | | | | | |
| 1.1 PREFERRED ALTERNATIVE: ALTERNATIVE 1 – PROPOSED DEVELOPMENT | | | | | | | | | | | | | |
| The Applicant, Velaskar Property Development, proposes to develop a shopping centre which will include associated services on Portion 16 of Farm Klein Dassenberg 20, Atlantis. The proposed development will require the rezoning and subdivision of the property from "Agriculture" to "General Business 1" in order to | | | | | | | | | | | | | |

allow for the development of the shopping centre. The development footprint will cover an area of approximately 1.7ha.

NEMA approval is required for the removal of more than 1ha but less than 20ha of an area that previously comprised of indigenous vegetation as established by the Biodiversity assessment (Cupido, 2023).

Portion 16 of the Farm Klein Dassenberg No. 20 is situated directly opposite the broader Atlantis South township of Witsand and the Atlantis Industry about 1.5km further to the west (see figure 1). The site is bordered by the R304 to the west and Saxonwold Road to the south. The site was previously used for agricultural purposes but the previous owners ceased activities in the early 2000s. No significant land use activities have been recorded since 2003. The Applicant purchased the property in June 2022 and subsequently wishes to construct a shopping centre.



Figure 1: Location of Farm Klein Dassenberg No. 20, Portion 16.

The site is strategically positioned in an area that exhibits a mixture of land uses, including nearby commercial activities, community facilities, and active agricultural operations. This mixed-use character, combined with the site's proximity to existing road infrastructure and growing residential areas, presents a viable opportunity for development (See Appendix C for images of existing land uses).

The proposed development will be constructed on the North-western portion of the property as detailed in *Figure 3: Subdivision Plan*. The proposed shopping centre will comprise of an anchor shop with various line shops. Provision is made for the possible future extension of the anchor shop.



Figure 2: Proposed design of the shopping centre

Table 1 provides an indication of the proposed buildings and their coverage.

| Building | Area (m ²) |
|---------------------|------------------------|
| Ground Floor Plan | 6816 |
| Covered Walkways | 1158 |
| Yard | 1087 |
| Total Covered Area | 7974 |
| Total Footprint | 17035 |
| Parking Bays | 605 |
| Percentage Coverage | 9% |

Table 1: Proposed building coverage taken from D.O.T Layout Plan

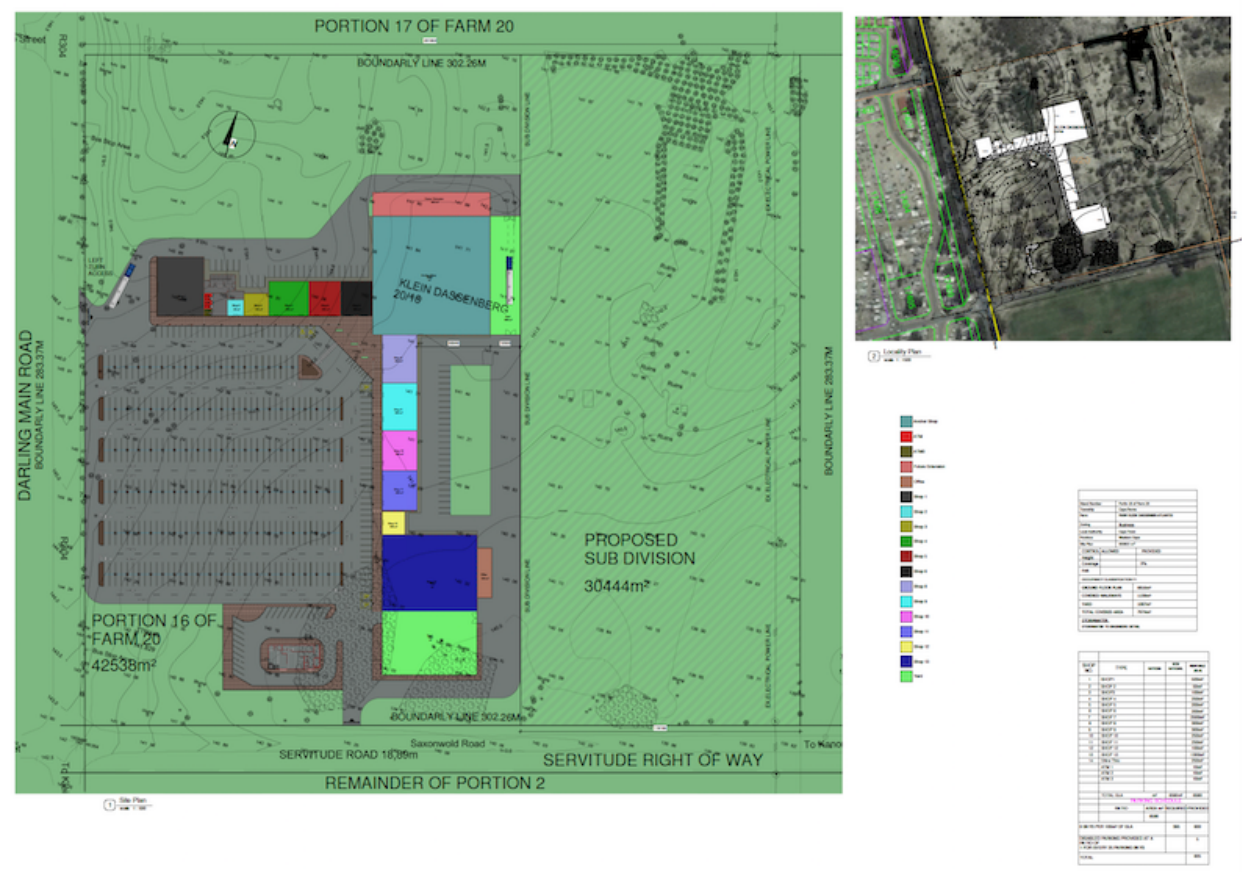


Figure 3: Subdivision Plan noting where the development is planned

Delivery bays and parking areas would be provided. As indicated in Table 1 and Figure 3, a total of 605 parking bays are proposed based on a minimum parking ratio of 6 parking spaces per 100m² gross leasable area.

The internal road network will consist of circulatory roadways, a parking area and 7.5m wide aisles between the parking bays. All other roads within the development will be approximately 5m wide. Streets for delivery vehicles will be approximately 6 m wide. The road layer works will be designed to suit the overall traffic and stormwater management approach selected for the development.

Infrastructure for water and electricity will be implemented as part of the development. Storm water infrastructure in the form of surface run-off and some sub surface draining will be implemented on site.

1.2 PROPOSED SERVICES INFRASTRUCTURE

The site is located on the peri urban edge of the Witsand residential area. It is serviced by the City of Cape Town Local Municipality. Ace Consulting (Pty) Ltd was appointed to investigate the civil engineering services required for the proposed shopping centre. A copy of the Engineering Services report is provided as Appendix G1.

The link services (roads and electricity) and the internal reticulation (water and sewer) of the development will be done by the Developer as part of the shopping centre development, to the satisfaction of the City of Cape Town Municipality.

The applicant will be responsible for the installation of the services, whereafter the services will be handed over to the municipality.

The following is noted:

1.2.1 Potable Water

The potable water Annual Average Daily Demand (AADD) for the proposed development is estimated to be 100 kilolitres per day (kl/day). The City of Cape Town Water and Sanitation Department has indicated that there is no infrastructure on the proposed development site however connection to the existing Atlantis PRV 1 zone is possible.

The closest potable water main is a Ø110mm potable water pipeline in Ntaka Street within the Witsand residential area. However, there is insufficient flow capacity and pressure due to the growing informality of the Witsand residential area to service the proposed development.

As noted in the Engineering Services report there are two possible connections points into the existing municipal network that could service the development. The two options are:

- extension of the Ø225mm potable water pipeline linking to the potable water main in Reygersdale Avenue with a length of 1200m; and,
- extension of the Ø160mm potable water pipeline linking to the potable water main at the Engen Garage on Klein Dassenberg Road with a length of 500m.

Based on the recommendation of the Engineer, it is proposed that the second option is pursued. This will entail the extension of the existing pipeline (160mm diameter) by approximately 500m to the main at Engen Garage. The extension of the existing pipeline will take place within the existing road reserve and will not result in additional removal of vegetation or impact on any watercourses.

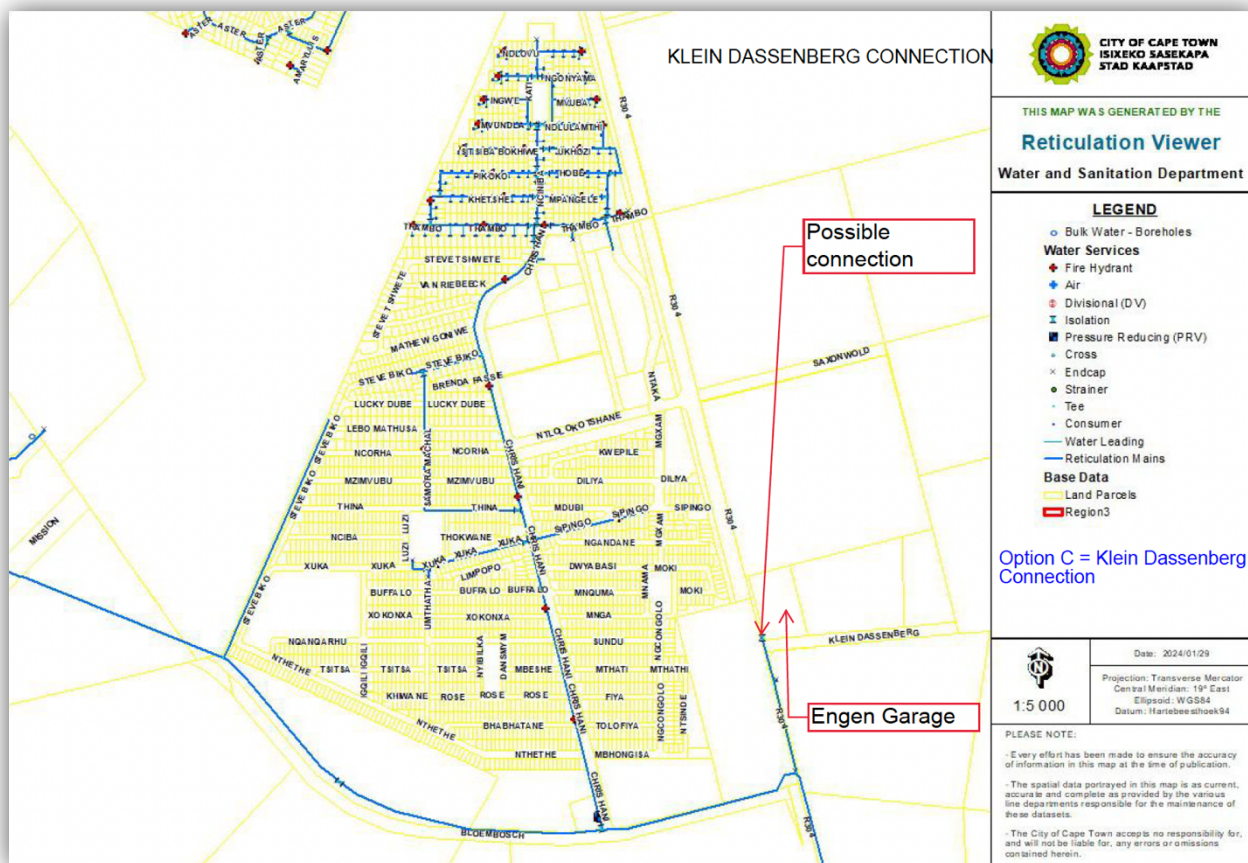


Figure 4: Potable water connection to the existing line at Engen Garage

The proposed development site is categorised as Moderate Risk 1 for firefighting design purposes. This requires the firefighting reticulation mains to have enough capacity for a flow of 50litres/ sec with a minimum pressure of 15 meters at the fire node.

A connection into the existing Municipal network will require an internal reticulation consisting of a Ø110mm uPVC Class 12 ring main to provide potable water. A separate fire water line will be provided to service the firefighting installations. The fire water line will be a Ø110mm uPVC Class 12 pipe.

The City of Cape Town Water and Sanitation Department has indicated that there is sufficient water resources to supply the development. **(Source: Services Capacity Confirmation Letters included in Appendix E16 of this report.)**

1.2.2 Sewer

The City of Cape Town has indicated that the sewer reticulation systems within the Witsand Residential area and the Witsand sewer pump station are strained due to the growing informality of the Witsand Residential area and as a result is experiencing operational difficulties. There is also no sewer infrastructure at the proposed site. In order to address this, three options are proposed (as mentioned in the Engineering Civil Services Report) however the construction of a raising main from the property to the gravity sewer main located on Reygersdal Avenue will be considered (See Figure 4 for the sewer connection). This will entail the following:

- Construction of a sewer pump station on the property to pump the sewer to R304 intersection.
- Construction of a sewer raising main from the property to Reygersdal Avenue.
- The total length of the raising main will be 1300m with an internal diameter of 150mm.

The advantage of this option is that it bypasses the operationally constrained Witsand sewer pump. The City of Cape Town Municipality will be engaged to determine how this proposed option fits in with the sewer master planning for the area.

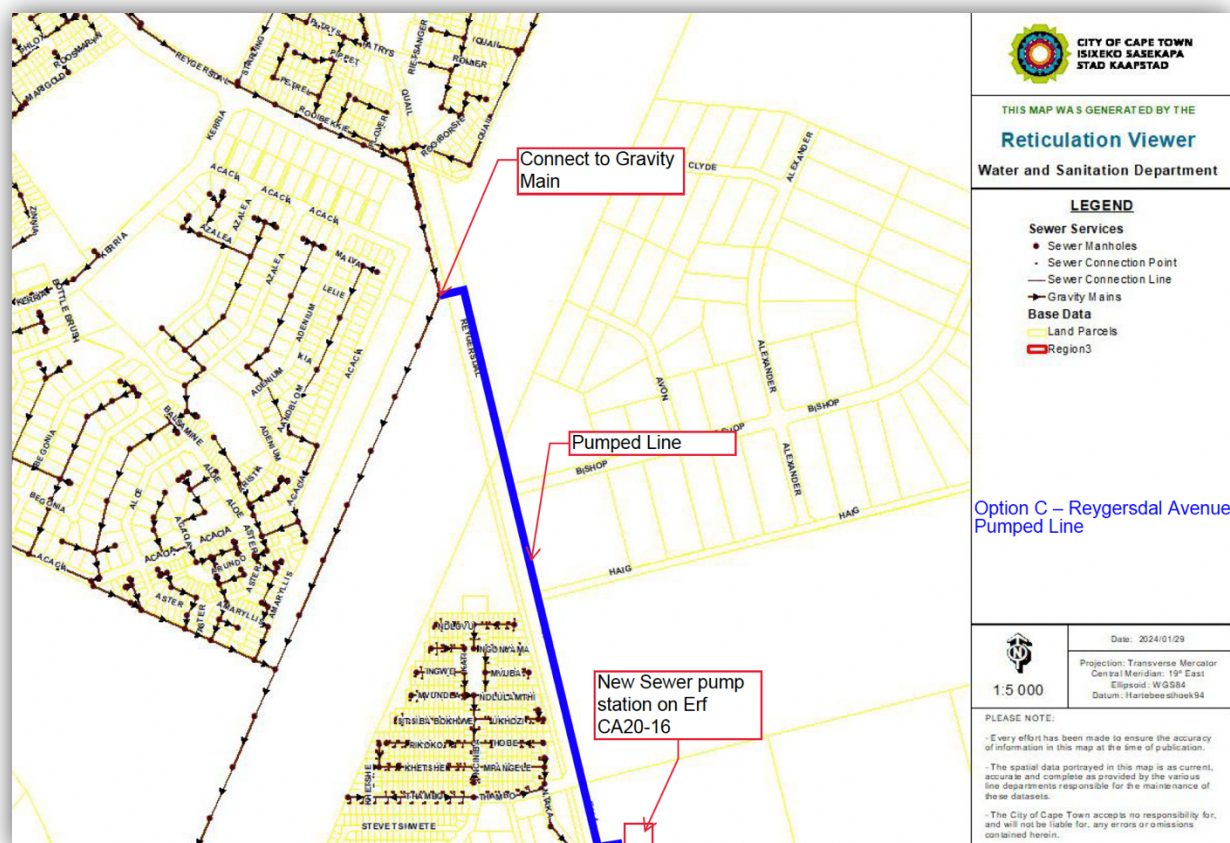


Figure 5: Foul sewer connection

There is sufficient capacity to treat the waste water at the Wesfleur Residential WWTW. **(Source: Services Capacity Confirmation Letters included in Appendix E16 of this report.)**

1.2.3 Solid Waste

Solid waste will be collected by the municipality through the existing waste collection services. Provision has been made for refuse area on the layout of the proposed development from where the waste will be collected. As noted in the Engineering Services Report (Appendix G1) confirmation has been received from the City of Cape Town Municipality that there is capacity to accommodate the proposed development.

(Source: Services Capacity Confirmation Letters included in Appendix E16 of this report.)

1.2.4 Electrical

There is an existing 11kV feeder on the property, Dassenberg/Farmers 2. Eskom has confirmed that the line is currently constrained due to voltage violations with no spare capacity.

A formal application will be submitted to Eskom to explore the options available to address this. This will be included in the draft Basic Assessment Report.

(Source: Services Capacity Confirmation Letters included in Appendix E16 of this report.)

1.2.5 Stormwater

There is no formal stormwater infrastructure in the vicinity of the proposed development. A Stormwater Management plan (SWMP) will be developed to manage the stormwater impacts of the proposed development and its effects and will be included in the draft Basic Assessment Report.

(Source: Services Capacity Confirmation Letters included in Appendix E16 of this report.)

1.2.6 Roads

The proposed development is bound by the R304 to the West and Saxonwold Road to the South. The internal roads within the development footprint will be a minimum of 7,5 meters, which will be the aisle between the parking bays. All other streets will be approximately 5m wide. Streets for delivery vehicles will be approximately 6 m wide.

A section of the Saxonwold Road would have to be upgraded according to the City of Cape Town's standards to accommodate the anticipated increased traffic volumes. There are no roadside kerbs or sidewalks on the R304 currently however this will be included as part of the proposed development.

The internal roads will consist of circulatory roadways, a parking area and 7.5m wide aisles between the parking bays. Traffic is further discussed under Section G.

| | | | | | | | | | | | | | | | | | | | | | |
|---|--|---|---|---|---|---|---|---|-----|---|---|---|-----|---|---|---|-------|---|---|---|---|
| 4.5. | Indicate how access to the proposed site(s) will be obtained for all alternatives. | | | | | | | | | | | | | | | | | | | | |
| The proposed development will be accessed via the R304 and Saxonwold roads. Access from Saxonwold Road will mainly be for servicing trucks and deliveries, although passengers' vehicles and taxis coming from the south will also be able to enter at this access. | | | | | | | | | | | | | | | | | | | | | |
| 4.6. | SG Digit code(s) of the proposed site(s) for all alternatives: | C | 0 | 1 | 6 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 2 | 0 | 0 | 0 | 0 | 1 | 6 |
| 4.7. | Coordinates of the proposed site(s) for all alternatives: | | | | | | | | | | | | | | | | | | | | |
| | Latitude (S) | | | | | | | | 33° | | | | 35' | | | | 6.55" | | | | |
| | Longitude (E) | | | | | | | | 18° | | | | 30' | | | | 34.9" | | | | |

SECTION C: LEGISLATION/POLICIES AND/OR GUIDELINES/PROTOCOLS

1. Exemption applied for in terms of the NEMA and the NEMA EIA Regulations

| | | |
|---|--|----|
| Has exemption been applied for in terms of the NEMA and the NEMA EIA Regulations. If yes, include a copy of the exemption notice in Appendix E18. | | NO |
|---|--|----|

2. Is the following legislation applicable to the proposed activity or development.

| | | |
|---|-----|----|
| The National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) ("ICMA"). If yes, attach a copy of the comment from the relevant competent authority as Appendix E4 and the pre-approval for the reclamation of land as Appendix E19. | | NO |
| The National Heritage Resources Act, 1999 (Act No. 25 of 1999) ("NHRA"). If yes, attach a copy of the comment from Heritage Western Cape as Appendix E1. | YES | |
| The National Water Act, 1998 (Act No. 36 of 1998) ("NWA"). If yes, attach a copy of the comment from the DWS as Appendix E3. | | NO |
| The National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004) ("NEM:AQA"). If yes, attach a copy of the comment from the relevant authorities as Appendix E13. | | NO |
| The National Environmental Management Waste Act (Act No. 59 of 2008) ("NEM:WA") | | NO |
| The National Environmental Management Biodiversity Act, 2004 (Act No. 10 of 2004 ("NEMBA"). | | NO |
| The National Environmental Management: Protected Areas Act, 2003 (Act No. 57 of 2003) ("NEMPAA"). | | NO |
| The Conservation of Agricultural Resources Act, 1983 (Act No. 43 of 1983). If yes, attach comment from the relevant competent authority as Appendix E5. | | NO |

3. Other legislation

| |
|--|
| List any other legislation that is applicable to the proposed activity or development. |
| Spatial Planning Land Use Management Act (Act 16 of 2013) Subdivision of Agricultural Land Act (Act 70 of 1970) City of Cape Town Municipal Planning By-law (2015) |

4. Policies

| |
|--|
| Explain which policies were considered and how the proposed activity or development complies and responds to these policies. |
| The City of Cape Town Municipal Spatial development Framework , 2023 and the Blaauwberg District Plan, 2023 were considered for the proposed shopping centre development. An explanation of the considerations are included in Section E of this report. |

5. Guidelines

| |
|---|
| List the guidelines which have been considered relevant to the proposed activity or development and explain how they have influenced the development proposal. |
| <p>1. Guideline on Public Participation (2013) Guideline considered in the undertaking of the public participation for the proposed development. All relevant provisions contained in the guideline were adhered to in the basic assessment process as appropriate, except where an exemption/ deviation has been granted by the Competent Authority.</p> <p>2. Guideline on Alternatives (2013) Guideline considered when identifying and evaluating possible alternatives for the proposed development. Alternatives that were considered in the impact assessment process are reported on in this Basic Assessment Report (see section E).</p> <p>3. Guideline on Need and Desirability (2013) Guideline considered during the assessment of the Need and Desirability of the proposed development project.</p> <p>4. Guideline on Environmental Management Plans (2005)</p> |

Guideline considered in the compilation of the EMP attached to this Basic Assessment Report.

5. Guideline for the Review of Specialist Input into the EIA Process (2005)

Guideline considered during the review and integration of specialist input into this Basic Assessment Report

6. Integrated Environmental Management Information Series 5: Impact Significance (2002)

Guideline considering during the identification and evaluation of potential impacts associated with the proposed development, and the reporting thereof in this Basic Assessment Report

7. Integrated Environmental Management Information Series 7: Cumulative Effects Assessment (2004)

Guideline considering during the assessment of the cumulative effect of the identified impacts.

8. DEA&DP's Circular EADP 0028/2014: "One Environmental Management System" - This circular provides further detail and clarity on the procedure to be followed during the Basic Assessment process, specifically under the new EIA Regulations 2014 (as amended).

6. Protocols

Explain how the proposed activity or development complies with the requirements of the protocols referred to in the NOI and/or application form

This section should be read in conjunction with the Site Sensitivity Verification Report (SSVR) (Appendix I2).

The Screening Tool Report (Appendix I1) identified themes ranging in sensitivity from Very High to Low. The SSVR provides reasons for disputing the screening tool sensitivity ratings and reasons as to why the screening tool identified specialist assessments not included in this environmental assessment process.

The proposed development site has been transformed from its natural state due to the previous agricultural activities which subsequently ceased. Since then, the site has become overgrown with Alien vegetation and various other anthropogenic activities i.e. dumping, establishment of an informal taxi rank, burns etc.

Table 2 extracted from the SSVR provides a summary of the environmental themes and identified specialist assessments. It also provides reasons why the specialist assessments identified in the Screening Report are not included in this environmental assessment process.

Table 2: Screening Tool identified themes and their sensitivities extracted from the Site Sensitivity Verification Report (Appendix I2).

| Environmental theme and/or specialist Assessments identified | Sensitivity rating | Impact Assessment / Compliance Statement / None | Reasons to not include |
|--|--------------------|---|---|
| Agriculture | Medium | Agricultural Impact Assessment | An agricultural assessment has been conducted. |
| Animal Species | Medium | Compliance Statement | Since the site is transformed, the habitat characteristics of the identified species in the Screening Tool Report do not resemble the habitats required by the animal |

| | | | |
|--------------------------------------|----------------------------------|----------------------|---|
| | | | species. The proposed development will therefore not impact any animal species. |
| Aquatic Biodiversity | Low | Compliance Statement | The proposed development does not impact any aquatic sensitivities. |
| Archaeological and Cultural Heritage | Low | None | A NID was submitted to HWC. HWC confirmed that no further studies would be required since there is no reason to believe the proposed development would impact any heritage resources. |
| Civil Aviation | High | None | The proposed development is within allowable building parameters and will not impact any civil aviation activities. |
| Defence | Low | None | The proposed development will not impact any defence activities. |
| Palaeontology | Low | None | A NID was submitted to HWC. HWC confirmed that no further studies would be required since there is no reason to believe the proposed development would impact any heritage resources. |
| Plant Species | Medium | Impact Assessment | The site is transformed however an assessment was conducted. |
| Terrestrial Biodiversity | Very High | Impact Assessment | The site is transformed however an assessment was conducted. |
| Socio economic | Additional assessment identified | None | It is anticipated that the proposed development will result in additional socio-economic benefits. |
| Visual Assessment | | None | It is anticipated that the site will have a minimal visual impact as there is an existing Service station, butcher and other smaller |

| | | | |
|--------------------|--|--|--|
| | | | shops in the same line of sight. A Landscape Plan will be developed. |
| Traffic Assessment | No rating as this is not included in the Screening Tool but this is a specialist assessment included in the assessment process. See Appendix G4: Traffic Assessment. | | |

SECTION D: APPLICABLE LISTED ACTIVITIES

List the applicable activities in terms of the NEMA EIA Regulations

| Activity No(s): | Provide the relevant Basic Assessment Activity(ies) as set out in Listing Notice 1 | Describe the portion of the proposed development to which the applicable listed activity relates. |
|-----------------|--|--|
| 10 | <p>The development and related operation of infrastructure exceeding 1 000 metres in length for the bulk transportation of sewage, effluent, process water, waste water, return water, industrial discharge or slimes –</p> <p>(iii) with an internal diameter of 0,36 metres or more; or</p> <p>(iv) with a peak throughput of 120 litres per second or more; excluding where—</p> <p>(a) such infrastructure is for the bulk transportation of sewage, effluent, process water, waste water, return water, industrial discharge or slimes inside a road reserve or railway line reserve; or</p> <p>(b) where such development will occur within an urban area.</p> | <p>A sewer raising main linking to the gravity main would need to be constructed to meet the demand of the proposed shopping centre. The total length of the raising main will be 1300m with an internal diameter of approx. 150mm</p> |
| 27 | <p>The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation, except where such clearance of indigenous vegetation is required for—</p> <p>iii. the undertaking of a linear activity; or</p> <p>ii. maintenance purposes undertaken in accordance with a maintenance management plan.</p> | <p>The development requires the clearance of approximately 1.7ha of an area that was originally composed of Atlantis Sand Fynbos.</p> <p>In its current state, it is composed of approximately 95 % problem and alien plant species with no species of conservation concern found on the site.</p> |
| 28 | <p>Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture, game farming, equestrian purposes or afforestation on or after 01 April 1998 and where such development:</p> | <p>The proposed development involves the rezoning and subdivision of agricultural land for the development of a shopping centre.</p> <p>The proposed development site is located outside an urban area and</p> |

| | | |
|--|---|---|
| | <p>1. (i) will occur inside an urban area, where the total land to be developed is bigger than 5 hectares; or</p> <p>(ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare; excluding where such land has already been developed for residential, mixed, retail, commercial, industrial or institutional purposes.</p> | the total land to be developed will be 17035m ² . |
| Listing Notice 3 | | |
| 4 | <p>The development of a road wider than 4 metres with a reserve less than 13.5 metres -</p> <p>(ii) <u>In Western Cape:</u></p> <p>ii. Areas outside of urban areas;</p> <p>(aa) Areas containing indigenous vegetation;</p> <p>...</p> | The internal roads will be a minimum of 7,5 meters, which will be the aisle between the parking bays. All other streets will be approximately 5m wide. Streets for delivery vehicles will be approximately 6 m wide. |
| 12 | The clearance of an area of 300 square metres or more of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan. | <p>The proposed development is approximately 1.7ha in extent and will entail the clearing of more than 300m² of an indigenous vegetation classified as endangered.</p> <p>Though the vegetation is classified as endangered, the site is severely compromised, and very little indigenous vegetation remains. The site has largely been disturbed due to agricultural and other anthropogenic activities such as dumping of waste, an informal taxi rank and is overgrown with alien vegetation.</p> |
| <p>Note:</p> <ul style="list-style-type: none"> The listed activities specified above must reconcile with activities applied for in the application form. The onus is on the Applicant to ensure that all applicable listed activities are included in the application. If a specific listed activity is not included in an Environmental Authorisation, a new application for Environmental Authorisation will have to be submitted. Where additional listed activities have been identified, that have not been included in the application form and amended application form must be submitted to the competent authority. | | |

List the applicable waste management listed activities in terms of the NEM: WA

| | | |
|-----------------|--|---|
| Activity No(s): | Provide the relevant Basic Assessment Activity(ies) as set out in Category A | Describe the portion of the proposed development to which the applicable listed activity relates. |
| N/A | N/A | N/A |

List the applicable listed activities in terms of the NEM: AQA

| | | |
|-----------------|--|---|
| Activity No(s): | Provide the relevant Listed Activity(ies) | Describe the portion of the proposed development to which the applicable listed activity relates. |
| | | |

| | |
|---|--|
| 4.1 | The Provincial Spatial Development Framework. |
| <p>The proposed development aligns with the principles of the Provincial Spatial Development Framework (PSDF) and specifically supports Vision Inspired Priority 4: Mobility and Spatial Transformation. Atlantis, a region traditionally marginalized due to spatial inequalities inherited from the apartheid era. The Witsand community stands to benefit from this development. This initiative supports the spatial goals of the PSDF by promoting economic growth, social inclusion, and environmental sustainability. It also aims to foster economic opportunities and diversification in underutilized areas with growth potential.</p> <p>The Western Cape Spatial Development Framework, as amended in November 2020, identifies four key focus areas to achieve Spatial Transformation:</p> <ol style="list-style-type: none"> 1. Enhancing accessibility to commercial services within walking distance for surrounding residents; 2. Developing inclusive places of opportunity. 3. Providing more opportunities for people to live in better locations. 4. Contributing to spatial justice by addressing historic retail service inequalities in Atlantis 5. Promoting economic inclusion through job creation and service provision. <p>The proposed development will contribute to the local economy by providing employment opportunities and skills development in an area with high unemployment rates. Additionally, it aims to improve the standard of living for residents by ensuring affordable and equitable access to shops and economic opportunities.</p> | |
| 4.2 | The Integrated Development Plan of the local municipality. |
| <p>The proposed development complies with Objective 1: Economic Growth and Objective 15: A more spatially integrated and inclusive city. It addresses the goals of the IDP in that it will provide a means to stimulate economic growth within the area and create more access to social amenities and economic opportunities whilst ensuring the protection of the environment.</p> | |
| 4.3. | The Spatial Development Framework of the local municipality. |
| <p>In terms of the Municipal Spatial Development Framework (MSDF), January 2023, the proposed development does not align to the MSDF. Portion 16 of Farm 20 is located within a Spatial Transformation Area (STA) termed the Discouraged Growth Area (DGA) and portion 16 is further identified as 'Areas of Agricultural Significance'.</p> <p>Despite the area's designation under the MSDF, the specific conditions and limitations of the site, combined with the potential economic and social benefits of the proposed development, provide a strong case for proceeding with the shopping centre.</p> <p>Based on the spatial transformation directive of the MSDF, the proposed development is aligned to promoting economic growth, providing essential services, and addressing specific community needs. The following should be noted:</p> <ol style="list-style-type: none"> a) Discouraged Growth Areas (DGAs): While the DSDF typically discourages urban development in these areas, the specific context—such as low agricultural potential, informal land use, and illegal dumping—provides grounds for reconsideration under exceptional circumstances. b) The DSDF allows for certain exceptions to the general prohibition on urban development outside the urban edge. Site-specific circumstances, such as low agricultural potential and existing informal uses, can be argued as valid reasons for considering development outside the urban edge. | |

- c) **Urban Expansion and Inevitability:** The agricultural assessment concludes that urban expansion onto the site is seen as inevitable due to economic constraints on farming, such as limited water availability and soil limitations. Given this inevitability, it is pragmatic to plan for a controlled and beneficial development rather than letting informal and illegal uses proliferate.
- d) **Social and Community Benefits:** By providing a centralized location for shopping, a new shopping centre enhances walkable access to goods and services. This reduces travel times and costs for the local community, fostering social cohesion and enhancing the overall community structure.
- e) **Infrastructure Improvement:** The development can lead to improvements in local infrastructure, including roads, utilities, and public transport. Enhancing infrastructure aligns with the DSDF's guidelines for supporting transport infrastructure and route designations, which is crucial for integrating new developments into the existing urban fabric.
- f) **Alignment with Broader Strategic Objectives:** The DSDF encourages developments that consider broader strategic objectives such as social inclusion, economic growth, and environmental sustainability. A shopping centre can be designed to meet these objectives by incorporating inclusive design principles, creating job opportunities, and minimizing environmental impacts.

The proposed site is also located between the 5-16km Urgent Protective Action Planning Boundary of the Koeberg Nuclear Power Station. As such a Traffic Evacuation Model (TEM) must be completed. See Annexure L for the completed form. Any measures in terms of safety evacuation and emergency planning will form part of the shopping centres Safety Protocols.

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| 4.4. | The Environmental Management Framework applicable to the area. |
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The proposed development is not aligned to the Environmental Management Framework (EMF) (hereafter referred to as the District Plan) for Blaauwberg, in terms of its designation as a Discouraged Growth Area. However according to the District Plan (2023), Atlantis is an area that has traditionally been dislocated from the City. The area has high unemployment rates and residents have limited access to economic opportunities.

The District Plan has also identified that:

1. Development on the edges of the R304 should not compromise the integrity of the existing agricultural activities.
2. Developments should promote an active interface and permeable perimeter fencing on development edging the R304.
3. Development should be focused on the western side of the R304 and development on the eastern edge should not be expanded.
4. The R304 scenic route and historic tree line should be protected.

The development will not impact on the historic tree line as the proposed design of the shopping centre will accommodate for the tree line.

Implementing sustainable building practices and integrating green spaces within the shopping centre can help preserve the rural character and scenic resources of R304. This is consistent with the DSDF's emphasis on protecting the rural aesthetic and promoting environmental conservation.

Developing a shopping centre could create jobs, stimulate local economic activity, and provide much-needed services to the community. These economic benefits can be a compelling argument for the development, aligning with broader socio-economic goals.

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| 5. | Explain how comments from the relevant authorities and/or specialist(s) with respect to biodiversity have influenced the proposed development. |
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In terms of the Biodiversity Assessment the site is transformed from its original state as a result of the previous agricultural activities and the current anthropogenic activities (informal taxi rank, dumping etc.) taking place on the site. Owing to the site's degree of transformation, there are no biodiversity sensitivities on the site.

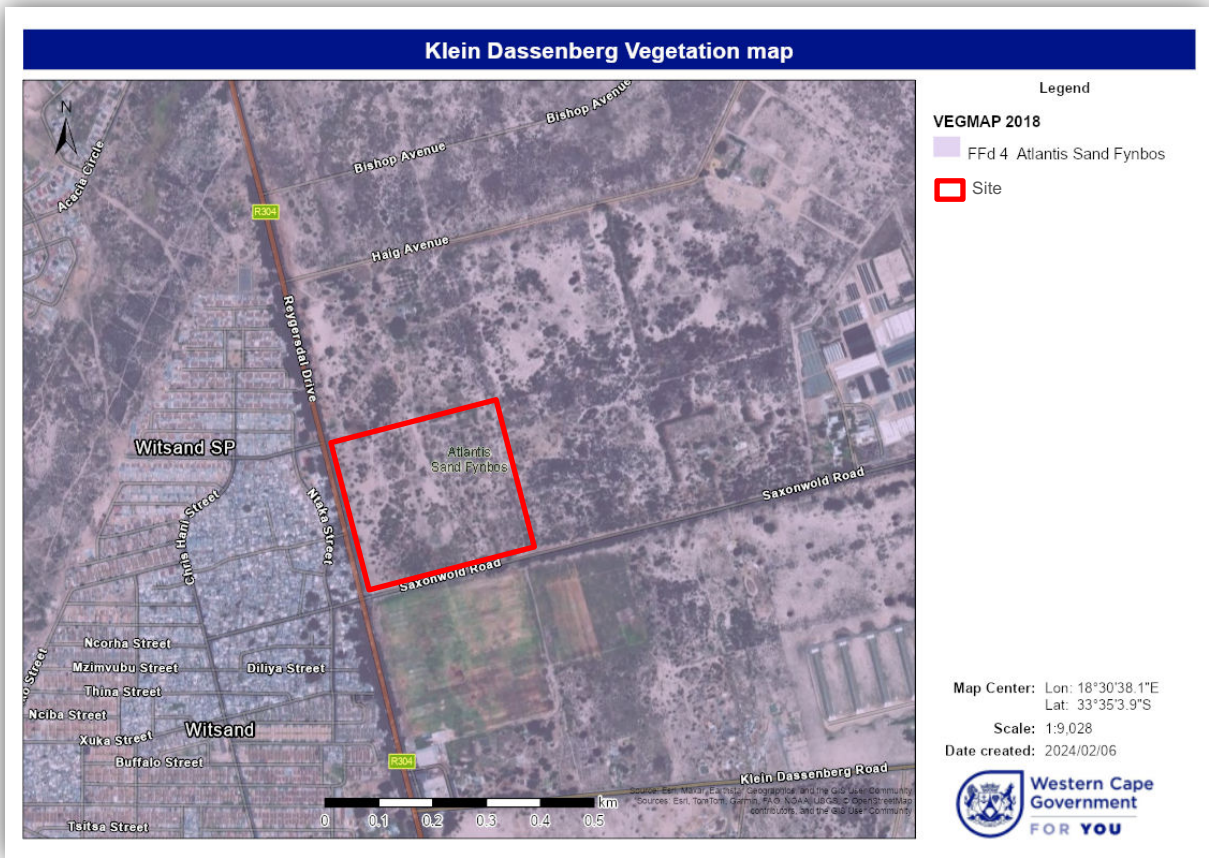


Figure 7: Vegetation type on the proposed site

Comments have not yet been received from relevant authorities. This Pre-Application BAR will be available for comment from **13 August to 15 September 2025**. Thereafter, comments received from relevant authorities will be included in the Draft BAR.

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| 6. | Explain how the Western Cape Biodiversity Spatial Plan (including the guidelines in the handbook) has influenced the proposed development. |
| As per the Western Cape Biodiversity Spatial Plan (WCBSP) the management guideline determines the ecological state or condition in which a parcel of land or freshwater feature should be maintained. The management objectives are determined for a range of variety of land uses i.e. Protected Areas, Critical Biodiversity Areas as well as Ecological Support Areas. | |
| As can be seen from Figure 8, the proposed development does not comprise any conservation priority areas, however in the broader site vicinity there are terrestrial conservation zones to the north as well as the east. The site falls within an Ecological Support Area (Restore) however the receiving environment is severely compromised. | |
| The vegetation type found on the proposed site is Atlantis Sand Fynbos which is rated as Endangered. As such a biodiversity assessment was conducted by KC Phyto to determine the | |

environmental sensitivity of the proposed site. It was concluded by the Specialist that the ecosystem on the site is in poor condition due to past farming activities and current disturbances therefore the remnant plant cover is far from representative of this vegetation type. It is composed of approximately 95 % problem and alien plant species. No Species of Conservation Concern was found on the site. No biodiversity constraints was found.

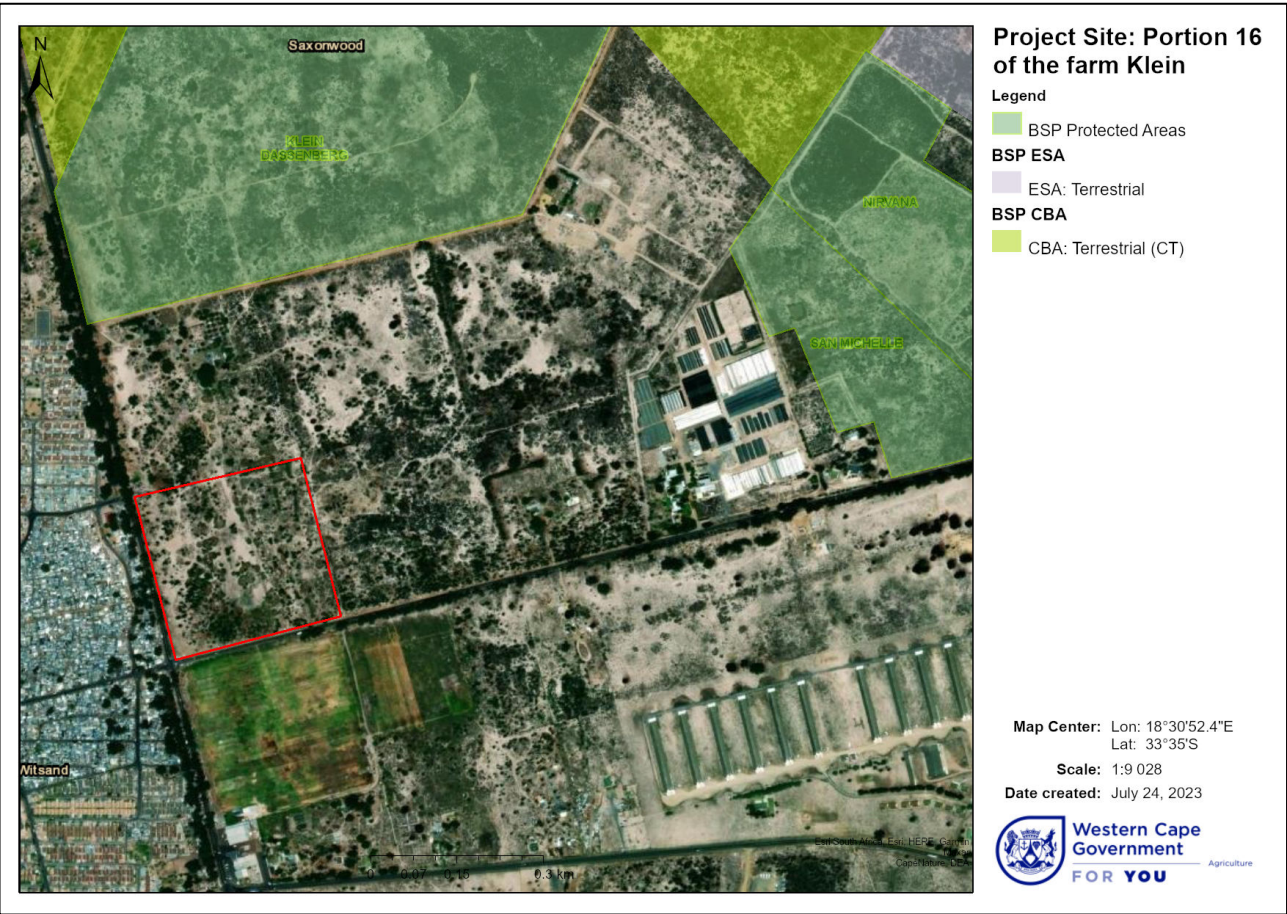


Figure 8: Biodiversity Spatial Plan for the proposed development

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| 7. | Explain how the proposed development is in line with the intention/purpose of the relevant zones as defined in the ICMA. |
| The site is not applicable to an ICMA zone. | |
| 8. | Explain whether the screening report has changed from the one submitted together with the application form. The screening report must be attached as Appendix I. |
| The Screening Tool Report submitted with the NOI has not changed. | |
| 9. | Explain how the proposed development will optimise vacant land available within an urban area. |
| The proposed development site is located outside of the urban edge on the peri-urban fringe node of the township of Witsand. | |
| <p>The development will enhance optimal urban land use by creating a logical urban extension immediately adjacent to an established residential area, reducing sprawl while enhancing connectivity and service access. Aligned with the National Development Plan 2030's emphasis on well-planned urban spaces, the project restructures Atlantis's urban form by establishing a defined commercial node within walking distance of public transport and residential areas. This approach transforms a problematic vacant site into a catalyst for economic growth, employment generation,</p> | |

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| and improved quality of life for surrounding communities, while preserving heritage resources and implementing sustainable infrastructure solutions. | |
| 10. | Explain how the proposed development will optimise the use of existing resources and infrastructure. |
| <p>At present, there is insufficient capacity within the infrastructure network in terms of bulk water and sewer services. It is proposed that link services will be required to connect the proposed development to the existing networks.</p> <p>By converting the proposed site into commercial use, it that aligns with the Transit Oriented Development Framework's objectives to concentrate development around public transport corridors like the R304. This strategic intensification leverages existing infrastructure while providing developer-funded upgrades to water, electricity, and stormwater systems that will benefit the broader Witsand area.</p> <p>The City of Cape Town Municipality provided confirmation of services. See Appendix E16.</p> | |
| 11. | Explain whether the necessary services are available and whether the local authority has confirmed sufficient, spare, unallocated service capacity. (Confirmation of all services must be included in Appendix E16). |
| <p>Service Capacity Confirmation Letters from the City of Cape Town Municipality are included in Appendix E16 of this report.</p> <p>Water and Sewer: it is confirmed that there is insufficient capacity within the respective reticulation systems. Therefore, link services are required as per the Ace Consulting Report (Appendix C and D of Appendix G1: Engineering Services Report. Also see Section B(4.4) of this report.</p> <p>Solid waste capacity has been confirmed by the municipality and is available – see Appendix G of Appendix E16: Engineering Services Report.</p> <p>Electricity: Eskom has confirmed that there is insufficient capacity available on the network. Further investigations are being pursued with Eskom and the proposed plan to address capacity will be included as part of the Draft BAR. See email correspondence from Eskom - Appendix E16.</p> <p>Stormwater Infrastructure is non-existent on the property and will therefore be developed as part of the development of the shopping centre. A Stormwater Management plan will be developed and will be included as part of the Draft BAR.</p> | |
| 12. | In addition to the above, explain the need and desirability of the proposed activity or development in terms of this Department's guideline on Need and Desirability (March 2013) or the DEA's Integrated Environmental Management Guideline on Need and Desirability. This may be attached to this BAR as Appendix K. |
| The Need and Desirability is attached as Appendix K. | |

SECTION F: PUBLIC PARTICIPATION

The Public Participation Process ("PPP") must fulfil the requirements as outlined in the NEMA EIA Regulations and must be attached as Appendix F. Please note that If the NEM: WA and/or the NEM: AQA is applicable to the proposed development, an advertisement must be placed in at least two newspapers.

1. Exclusively for linear activities: Indicate what PPP was agreed to by the competent authority. Include proof of this agreement in Appendix E22.

| |
|--|
| Not applicable. The proposed development is not a linear activity. |
|--|

2. Confirm that the PPP as indicated in the application form has been complied with. All the PPP must be included in Appendix F.

| | |
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| <p>As required, public participation will be undertaken in terms of Section 41 of the 2014, NEMA: EIA Regulations, as amended.</p> <p>The following has been conducted to date:</p> <ol style="list-style-type: none"> 1. A Site notice was placed on 6 July 2023 at the proposed development site. 2. An ad was placed in the local Atlantis newspaper, Impact News, 14 June 2023 informing I &APs about the proposed development and requesting I&APs to register. <p>See Appendix F for evidence thereof.</p> <p>Following the submission of the application for environmental authorisation, registered I&APs and authorities will be provided with the opportunity to comment on the Pre-Application BAR. No extensions will be allowed during this commenting period due to the strict statutory timeframes.</p> <p>A formal 30-day Public Participation Process (PPP) will be conducted as part of this Draft BAR and will be done in accordance with Regulation 41 of the EIA Regulations (2014, as amended, Government Notice No. R326 of 2017) and DEADP Guideline on Public Participation (2013).</p> <p>The Pre-Application BAR is available for comment from the 13 August 2025 - 15 September 2025 and all comments received will be recorded.</p> | |
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3. Confirm which of the State Departments and Organs of State indicated in the Notice of Intent/application form were consulted with.

| | |
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| <ol style="list-style-type: none"> 1. Department of Environmental Affairs and Development Planning: (Region 1) (City of Cape Town & West Coast District) – Zaahir Toefy Tel: 021 483 2700; Email: DEADPEIAadmin@westerncape.gov.za 2. Department of Water and Sanitation - Nelisa Ndobeni Tel: 021 941 6000; Email: ndobenin@dws.gov.za 3. Department of Environmental Affairs and Development Planning Directorate: Waste Management - Lance Mcbain-Charles Tel: 021 483 2705; Email: lance.mcbain-charles@westerncape.gov.za 4. Western Cape Department of Agriculture - Cor van der Walt Tel: 021 808 5099; Email: cor.vanderwalt@westerncape.gov.za 5. City of Cape Town - Environmental Management - Ms Sonja Warnich-Stemmet, Tel: 021 444 0598; Email: sonja.warnichstemmet@capetown.gov.za 6. City of Cape Town – Municipality Ward Councillor: Ward 32 - Moosa Raise Tel: 0214446090; Email: moosa.raise@capetown.go.za 7. Eskom - Owen Peters Cell: 084 460 5801; Email: owen.peters@eskom.co.za 8. CapeNature-Land Use Advice - Ismat Adams Tel: 021 866 8000; Email: iadams@capenature.co.za 9. Heritage Western Cape - Waseefa Dhansay Tel: 021 483 9598; Email: Waseefa.Dhansay@westerncape.gov.za | |
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4. If any of the State Departments and Organs of State were not consulted, indicate which and why.

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|-----|
| N/A |
|-----|

5. if any of the State Departments and Organs of State did not respond, indicate which.

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| This is the Pre-Application BAR therefore this section will be updated with the Draft BAR. |
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6. Provide a summary of the issues raised by I&APs and an indication of the manner in which the issues were incorporated into the development proposal.

1. A Background Information Document (BID) was sent to the list of stakeholders as indicated under point 3 above. A comment was received from the City Of Cape Town Environmental Management Branch. Responses to the comments is recorded in the Comments and Responses Report (See Appendix F5).
2. Based on the comment received, an Agricultural assessment was conducted to address the concerns raised. These findings have been noted under Section G: Description of Receiving Environment Point 10.
3. Following a meeting held between various stakeholders and the Applicant to discuss the request for an amendment to the Urban Development Edge (UDE), a number of letters of support was received. (See Appendix F4)

Note:

A register of all the I&AP's notified, including the Organs of State, and all the registered I&APs must be included in Appendix F. The register must be maintained and made available to any person requesting access to the register in writing.

The EAP must notify I&AP's that all information submitted by I&AP's becomes public information.

Your attention is drawn to Regulation 40 (3) of the NEMA EIA Regulations which states that "*Potential or registered interested and affected parties, including the competent authority, may be provided with an opportunity to comment on reports and plans contemplated in subregulation (1) prior to submission of an application but **must** be provided with an opportunity to comment on such reports once an application has been submitted to the competent authority.*"

All the comments received from I&APs on the pre -application BAR (if applicable and the draft BAR must be recorded, responded to and included in the Comments and Responses Report and must be included in Appendix F.

All information obtained during the PPP (the minutes of any meetings held by the EAP with I&APs and other role players wherein the views of the participants are recorded) and must be included in Appendix F.

Please note that proof of the PPP conducted must be included in Appendix F. In terms of the required "proof" the following is required:

- a site map showing where the site notice was displayed, dated photographs showing the notice displayed on site and a copy of the text displayed on the notice;
- in terms of the written notices given, a copy of the written notice sent, as well as:
 - if registered mail was sent, a list of the registered mail sent (showing the registered mail number, the name of the person the mail was sent to, the address of the person and the date the registered mail was sent);
 - if normal mail was sent, a list of the mail sent (showing the name of the person the mail was sent to, the address of the person, the date the mail was sent, and the signature of the post office worker or the post office stamp indicating that the letter was sent);
 - if a facsimile was sent, a copy of the facsimile Report;
 - if an electronic mail was sent, a copy of the electronic mail sent; and
 - if a "mail drop" was done, a signed register of "mail drops" received (showing the name of the person the notice was handed to, the address of the person, the date, and the signature of the person); and
- a copy of the newspaper advertisement ("newspaper clipping") that was placed, indicating the name of the newspaper and date of publication (of such quality that the wording in the advertisement is legible).

SECTION G: DESCRIPTION OF THE RECEIVING ENVIRONMENT

All specialist studies must be attached as Appendix G.

1. Groundwater

| | | | |
|------|---|--|----|
| 1.1. | Was a specialist study conducted? | | NO |
| 1.2. | Provide the name and or company who conducted the specialist study. | | |
| N/A | | | |
| 1.3. | Indicate above which aquifer your proposed development will be located and explain how this has influenced your proposed development. | | |
| N/A | | | |
| 1.4. | Indicate the depth of groundwater and explain how the depth of groundwater and type of aquifer (if present) has influenced your proposed development. | | |

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| N/A |
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2. Surface water

| | | | |
|------|--|-----|--|
| 2.1. | Was a specialist study conducted? | YES | |
| 2.2. | Provide the name and/or company who conducted the specialist study. | | |
| | Earl Herdien conducted an Aquatic Biodiversity Compliance Statement (see Appendix G5) | | |
| 2.3. | Explain how the presence of watercourse(s) and/or wetlands on the property(ies) has influenced your proposed development. | | |
| | Based on the investigations undertaken, and the site inspection, there are no watercourse(s) and/or wetland(s) on the site. The following is noted: <ul style="list-style-type: none">• The site is inland and is not near any estuarine areas.• No wetlands are present on the site. The site is not within any aquatic Ecological Support Areas or Critical Biodiversity Areas. | | |

3. Coastal Environment

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|------|--|--|----|
| 3.1. | Was a specialist study conducted? | | NO |
| 3.2. | Provide the name and/or company who conducted the specialist study. | | |
| | N/A | | |
| 3.3. | Explain how the relevant considerations of Section 63 of the ICMA were taken into account and explain how this influenced your proposed development. | | |
| | N/A | | |
| 3.4. | Explain how estuary management plans (if applicable) has influenced the proposed development. | | |
| | N/A | | |
| 3.5. | Explain how the modelled coastal risk zones, the coastal protection zone, littoral active zone and estuarine functional zones, have influenced the proposed development. | | |
| | N/A | | |

4. Biodiversity

| | | | |
|---|--|-----|--|
| 4.1. | Were specialist studies conducted? | YES | |
| 4.2. | Provide the name and/or company who conducted the specialist studies. | | |
| KC Phyto Enterprises cc | | | |
| Dr Christopher Cupido conducted a Biodiversity Assessment (see Appendix G3) | | | |
| 4.3. | Explain which systematic conservation planning and other biodiversity informants such as vegetation maps, NFEPA, NSBA etc. have been used and how has this influenced your proposed development. | | |
| A Biodiversity Assessment was conducted with the following findings: | | | |
| The site is vacant and the original vegetation, Atlantis Sand Fynbos no longer exists in a pristine state. | | | |
| The site is slightly undulating with the lowest area closest to Saxonwold Road where water accumulated following the abundant rain. Current disturbances on the site are solid waste dumping, wood cutting and burning, an informal structure and children occasionally playing on it. The deep sand is approximately 95 % covered in vegetation. | | | |
| Individual species are scattered amongst problem plants and alien weeds. The weedy flora is dominated by alien and indigenous graminoids such as <i>Ehrharta calycina</i> , <i>E. villosa</i> , <i>Avena fatua</i> , <i>Bromus diandrus</i> , <i>Lolium multiflorum</i> , <i>Isolepis antarctica</i> , and <i>Restio</i> sp. Other problem plants like <i>Eucalyptus</i> sp (bluegum), Port Jackson (<i>Acacia saligna</i>), <i>Emex australis</i> , <i>Erodium moschatum</i> , <i>Malva parviflora</i> , <i>Geranium mole</i> , <i>Rumex acetosella</i> , <i>Chenopodium murale</i> , <i>Sonchus oleraceus</i> , <i>Urtica urens</i> and <i>Echium plantagineum</i> are found throughout the site. | | | |
| Indigenous plants are present in insignificant numbers, excepts for large clumps of <i>Carpobrotus edulis</i> . | | | |
| Relevant maps used were i.e. Cape Farm Mapper, Western Cape Department of Agriculture for the relevant portion of the Vegetation Types, SANBI BGIS for the Biodiversity Status and Google Earth Pro 2022 for the satellite imagery of the locality, historical land use and patterns of the vegetation cover of the study area. | | | |
| The national ecosystem status was assessed against the South African National List of Threatened Ecosystems (Government Gazette 2022) and the 2017 City of Cape Town Biodiversity Network GIS layer was used to determine the "inferred conservation significance of the of the receiving environment. | | | |
| The faunal diversity on the site is low as is expected of a disturbed habitat and due to the ongoing disturbances by human activities. No faunal Species of Conservation Concern we recorded on the site. | | | |
| 4.4. | Explain how the objectives and management guidelines of the Biodiversity Spatial Plan have been used and how has this influenced your proposed development. | | |
| The site is not located within any Protected Areas or CBA identified in the City of Cape Town Biodiversity Network (2017). The site falls within an ESA (Restore) however it is severely compromised. | | | |
| 4.5. | Explain what impact the proposed development will have on the site specific features and/or function of the Biodiversity Spatial Plan category and how has this influenced the proposed development. | | |

The sensitivity rating has been assessed through a desktop study and a field visit. The initial screening indicated that the site was of a very high sensitivity however following ground truthing, the site was found to be highly transformed with no species of conservation significance found. The site therefore has a **low sensitivity**.

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| 4.6. | If your proposed development is located in a protected area, explain how the proposed development is in line with the protected area management plan. |
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The proposed development is not located in a protected area.

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| 4.7. | Explain how the presence of fauna on and adjacent to the proposed development has influenced your proposed development. |
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According to the Screening Tool Report (Appendix I) the site is of medium sensitivity because of the potential presence of the *Circus ranivorus*, *Circus maurus*, *Afrotis afra*, *Aloeides egerides*, *Pachysoma Aesculapius*, *Bullacris obliqua*.

However based on the Biodiversity assessment, the following was noted:

- Faunal diversity on the site is low as is expected of a disturbed habitat and due to the ongoing disturbances by human activities.
- No faunal Species of Conservation Concern we recorded on the site.
- Overall, the site's faunal sensitivity is rated as LOW.

5. Geographical Aspects

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| Explain whether any geographical aspects will be affected and how has this influenced the proposed activity or development. |
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| The proposed development will not have an impact on any geographical aspects. |
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6. Heritage Resources

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| 6.1. | Was a specialist study conducted? | YES | |
| 6.2. | Provide the name and/or company who conducted the specialist study. | | |
| Ron Martin, Ron Martin Heritage Consultancy | | | |
| 6.3. | Explain how areas that contain sensitive heritage resources have influenced the proposed development. | | |
| <p>A Notice of Intent to Develop was submitted to Heritage Western Cape (HWC). The HWCs final response to the NID (HWC Case No: HWC23091812KB1012 dated 15 November 2023) notes that no further action is required.</p> <p>However should any heritage resources such as graves and human burials, archaeological material and paleontological material be discovered during the construction activities then work must be stopped immediately, and Heritage Western Cape must be notified without delay.</p> <p>See Appendix G2: HWC Final Response to NID.</p> | | | |

7. Historical and Cultural Aspects

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| Explain whether there are any culturally or historically significant elements as defined in Section 2 of the NHRA that will be affected and how has this influenced the proposed development. |
| <p>Remnants of the historic avenue of Eucalyptus trees exists along the Western boundary of the site.</p> <p>The proposed development will not physically affect the resource, as it will be set back significantly from the road reserve. Also, any vehicular ingress/egress points along the western boundary of the site will be located within the existing gaps in the tree line, and any other gaps will be rehabilitated by active planting of Eucalyptus sp.</p> |

8. Socio/Economic Aspects

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| 8.1. | Describe the existing social and economic characteristics of the community in the vicinity of the proposed site. |
| <p><u>Socio economic input from the Blaauwberg District Plan, 2023:</u></p> <p>The site is located within Ward 32 of the City of Cape Town Municipality. The following social and economic characteristics has been extracted from the Blaauwberg District Plan, 2023:</p> <ul style="list-style-type: none"> • Most of the district north of Cape Town city is undeveloped. Atlantis, Moravian-mission villages of Mamre and Pella-Katzenberg fall within this district. • The site is located within the 5-16km Urgent Protective Action Planning Zone boundary of the Koeberg Nuclear Power Station. • The number of households in the Blaauwberg District was estimated to be approximately 110 000 in 2018. The average household size for the district was 2.93 people per household in 2018. • Witsand in Atlantis was one of the areas that experienced the greatest population growth between 2011 – 2018. • The number of households increased twofold between 2001 and 2011 and a further 20% between 2011 and 2018. <p>Employment:</p> <ul style="list-style-type: none"> • The areas of Du Noon, Wesfleur and Witsand in Atlantis have a relatively high unemployment rate of 40 – 45%. • There was an increase in the number of households earning no income and in every category above the lowest income bands. • Witsand, Du Noon and Kleine Zoute have median incomes of R R801 - R1 600. <p><u>Socio-Economic input from Stats SA:</u></p> <p>According to the 2011 Census Data by Statistics SA², the following is noted:</p> <ul style="list-style-type: none"> • The total population in 2011 was 67 491 persons with 15 565 households. • Population breakdown: 85% Coloured, 12,9% Black African, 4,4% Indian/Asian, 0,1% White, 1,6% • 98.4% of water is provided by the municipality. • 82% of the population have access to flushed toilets connected to a sewerage system. • 95.6 % of households wate is removed by the municipality/private company at least once per week. • 65,3 % of the population do not have access to internet. <p>For the population, electricity is the main source of energy for cooking (84%), heating, and lighting (both 76,7%).</p> | |
| 8.2. | Explain the socio-economic value/contribution of the proposed development. |
| <p>The proposed development would contribute towards economic growth and job creation during both the construction and operational phases.</p> | |
| 8.3. | Explain what social initiatives will be implemented by applicant to address the needs of the community and to uplift the area. |
| <p>Direct jobs will benefit the communities in the surrounding areas in the construction and operational phases. The development could potentially lead to increased property values, thereby boosting local tax revenues that can be reinvested in essential public services and community development projects.</p> | |

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| 8.4. | Explain whether the proposed development will impact on people's health and well-being (e.g. in terms of noise, odours, visual character and sense of place etc) and how has this influenced the proposed development. |
| <p>Visual character or sense of place - The proposed development is not anticipated to have any impact on visual character or sense of place.</p> <p>Noise - Construction vehicles and other construction machinery will increase the noise levels during working hours. Increased noise levels may be a nuisance factor to the neighbouring residents or businesses. However, construction works are not anticipated to increase the existing noise levels significantly.</p> <p>Dust - Dust generation because of earthworks and construction activities during the development phase is anticipated. The potential dust impact is anticipated to be low considering that the recommended management and mitigation measures included in the EMPr will be implemented. This is also temporary in nature.</p> | |

9. Traffic Aspects

A Traffic Impact Assessment (see Appendix G4) was required due to the proposed change in land use and subdivision. Imodie Projects was appointed to conduct the assessment.

The following findings were noted:

- Access to the proposed development will be from both the R304 main road and Saxonwold Road. Access from Saxdown Road will mainly be for Servicing trucks and deliveries, although passengers' vehicles and taxis coming from the south will also be able to enter at this access. All accesses will be controlled.
- Vehicle ownership within the area is low and most people make use of public transport (minibus taxis or buses) or walk. Currently, an informal taxi rank exists on the property however provision has been made as shown on the site development layout.
- The proposed development will generate just more than 150 vehicle trips in during the peak hour periods. All intersections that will have an additional 50 peak hour trips on the critical movement were included.
- Potential additional development trips are calculated at:

Table 2: Trip generation based on the proposed development

| AM | | FRI PM PEAK | | SAT PEAK | |
|----|-----|-------------|-----|----------|-----|
| In | Out | In | Out | In | Out |
| 18 | 10 | 76 | 76 | 102 | 102 |

- Traffic counts were undertaken to determine the existing Level of Service at 3 intersections and calculated the Level of Service with 2028 background traffic volumes and then traffic volumes with the proposed development. Table 3 indicates the level of service for the intersections at different calculated periods.

| Inters ID | Current Scenario | | Current plus Development | | 2028 plus Development | |
|------------------------------|------------------|----------|--------------------------|----------|-----------------------|--------|
| | Fri PM | Sat AM | Fri PM | Sat AM | Fri PM | Sat AM |
| <u>Intersection 2</u> | | | | | | |
| Southern Approach | B | B | B | B | B | B |
| Western Approach | C | C | C | C | C | C |
| Northern Approach | B | B | B | B | B | B |
| Eastern Approach | - | - | - | - | - | - |
| <u>Intersection 3</u> | | | | | | |
| Southern Approach | C | B | D | C | E | B |
| Western Approach | F | D | F | E | F | D |
| Northern Approach | B | B | C | C | C | B |
| Eastern Approach | D | D | D | C | E | D |
| <u>Intersection 4</u> | | | | | | |
| Southern Approach | B | A | B | B | B | B |
| Western Approach | - | - | - | - | - | - |
| Northern Approach | B | B | B | B | B | B |
| Eastern Approach | C | C | C | C | C | C |

Table 3: Levels of Service (LOS) at various intersections in close proximity to the proposed development.

- Based on the analysis conducted, Intersection 3 is currently experiencing capacity problems with LOS F being experienced on the western approach. All other intersections are operating at acceptable LOS.
- It is recommended that a traffic circle be implemented that will improve the LOS at intersection 3.
- The Traffic Assessment concludes that the pre- and post-development traffic impact is negligible.

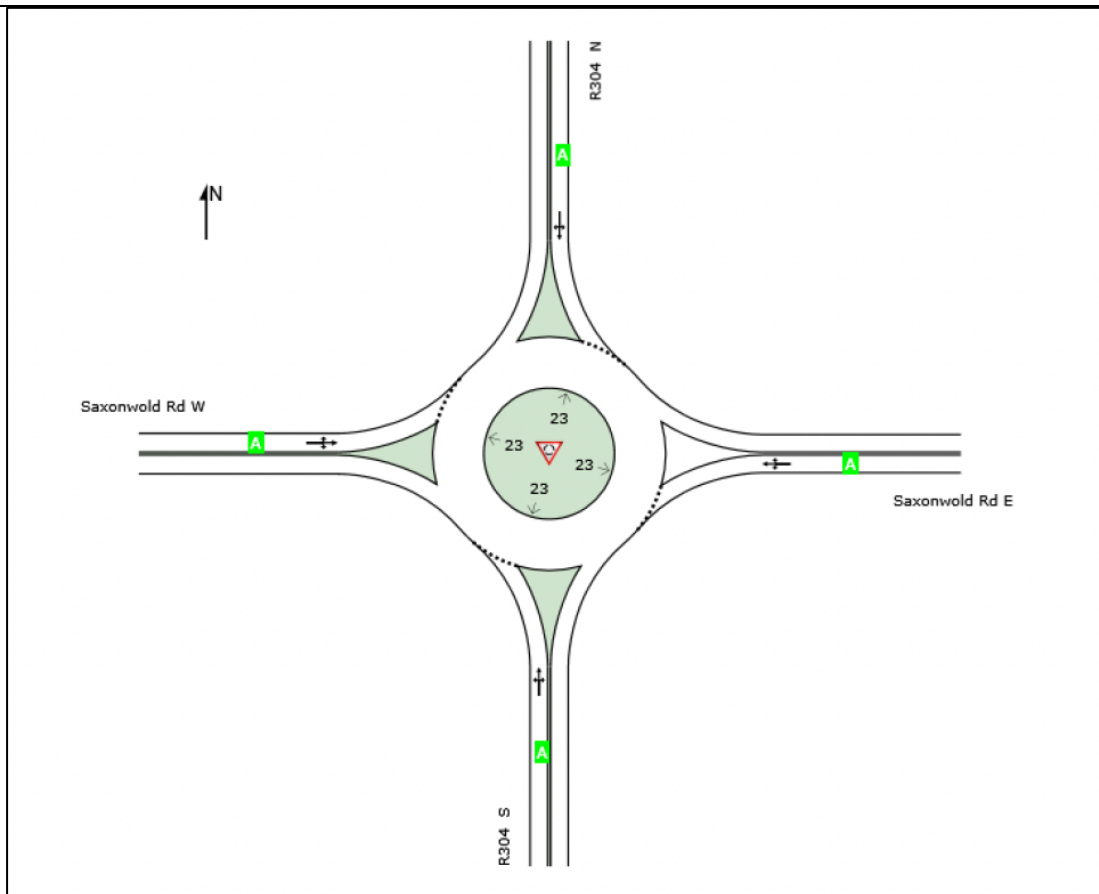


Figure 9: Proposed upgrading of the Saxonwold/R304 intersection

10. Agricultural Impacts

An Agricultural assessment was conducted following comments received from the City of Cape Town Environmental Management Department dated 14 August 2023. See Appendix G6.

KC Phyto was appointed to conduct the Agricultural Assessment. The following findings was noted:

1. Poor Land Capability and Soil Quality:

- The proposed project site is located in Klein Dassenberg, Atlantis and was previously used for agricultural activities but has been left fallow for the past 20 years.
- The site has a mid-latitude desert climate with limited surface water resources and sandy soils associated with extensive dune systems. The land capability is rated as marginal to moderately arable.
- The site has a low agricultural potential with a "Class IV" land capability rating, indicating marginal to moderately potential arable land.

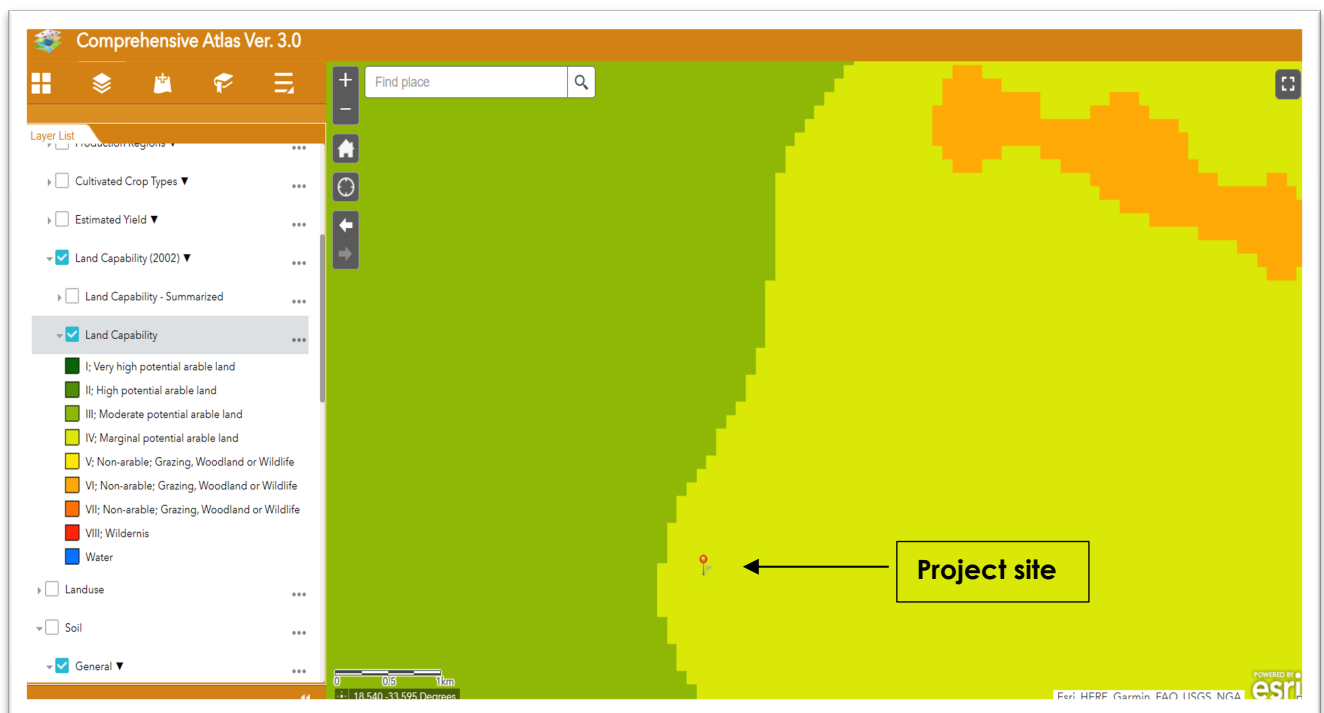


Figure 10: Land Capability Map for the study site

- Soil profiling revealed no significant soil structure - only unconsolidated sands associated with dune habitat.
- The soils consist of sandy soils on the Atlantis Coastal Plain that are generally unsuitable for agriculture.
- Two types of sand were identified (grey and yellow), but these lack the structure needed for productive agriculture.

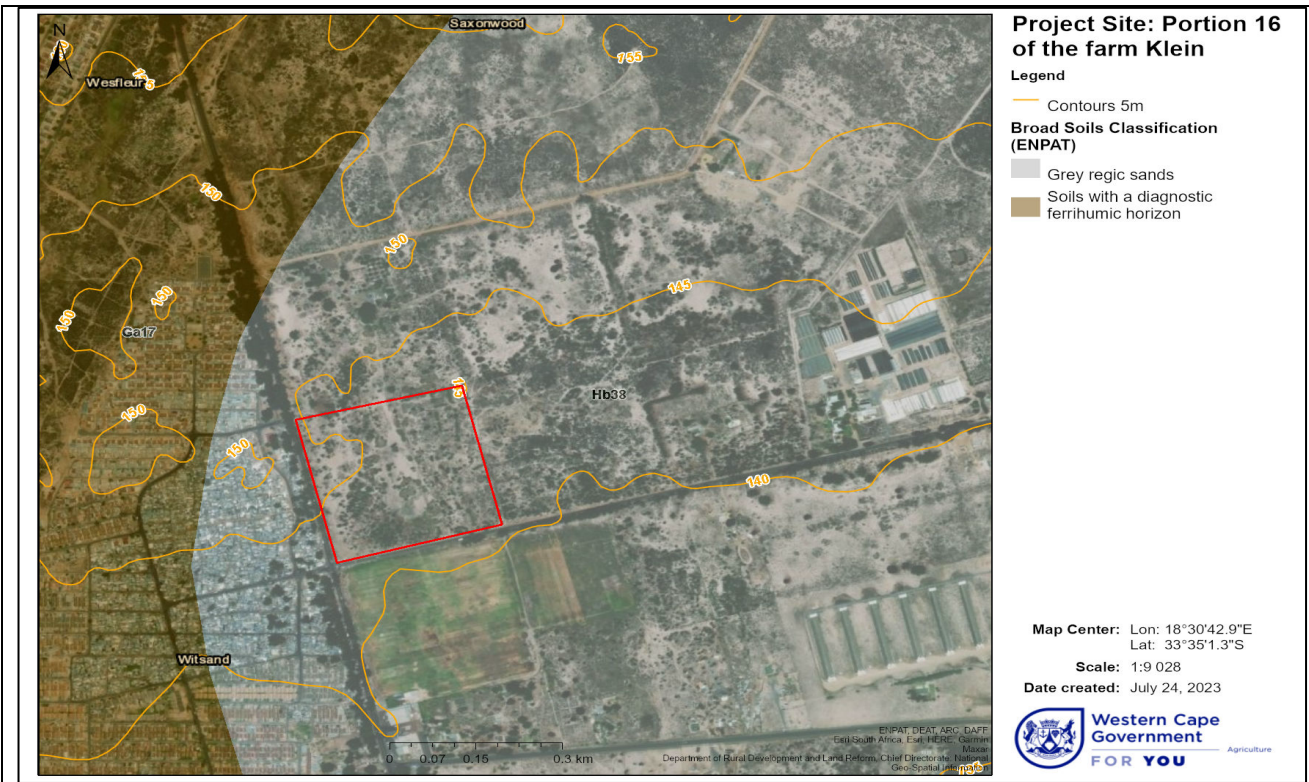


Figure 11: Study site soil map with contour lines (dune on Northern site extent indicated as 150m)



Figure 12: Common grey dune sands predominant landscape unit found on the site

2. Environmental Degradation:

- The site is significantly transformed from its original Dune Strandveld reference state.
- Evidence of significant disturbance including recent burns, past alien vegetation invasion, and habitat erosion.
- The last evidence of agricultural activity dates back to 2003, after which the site was left fallow under alien vegetation invasion management.
- The site is regarded as significantly disturbed and degraded.



Figure 13: Google Earth Timeline Image - February 2003 (Herdien 2023)

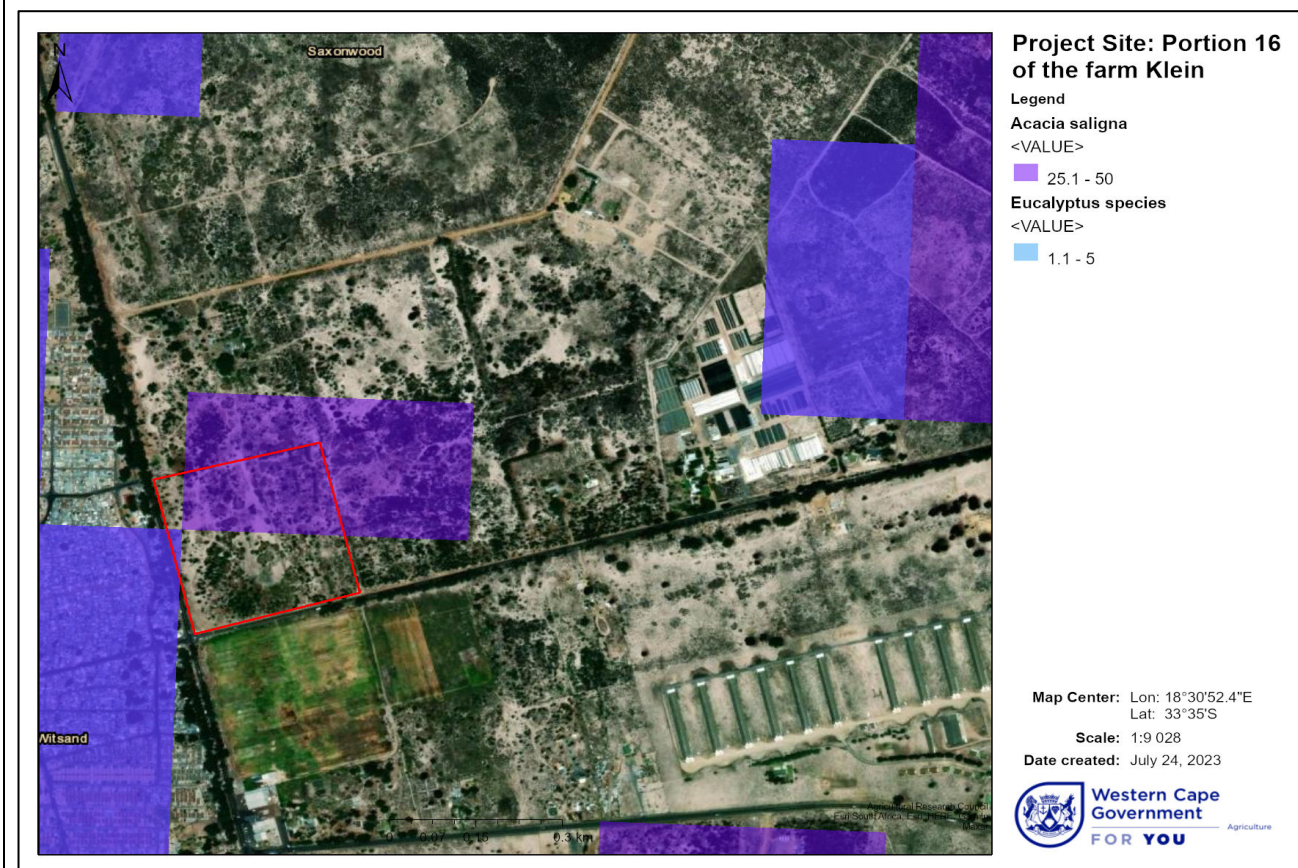


Figure 14: Study site alien vegetation presence model (Herdien 2023)



Figure 15: Dumping and burning noted on site

3. Climate and Water Constraints:

- Limited water availability in the greater Atlantis area presents a significant constraint.
- Lower than average rainfall in the Western Cape limits grazing capacity.
- Property size restrictions further limit stock farming potential.

4. Main Agricultural Impacts Identified

Direct Physical Impacts:

- Alteration and degradation of existing soil resources.
- Increased weathering and soil erosion potential.
- Complete loss of agricultural land and any existing infrastructure.
- Destruction of any remaining agricultural habitat or arable soil capability.

Broader Area Impacts:

- Potential impacts on neighbouring agricultural cultivation and Agri-industry operations.
- Stormwater modification and impairment affecting surrounding areas.
- Vehicle, machinery, and equipment pollution risks during construction and operations.
- Disturbance of existing agricultural practices in the surrounding catchment area.

Economic Constraints:

- Soil limitations make commercial agriculture unviable.
- Limited irrigation potential due to water scarcity.
- Threats from land occupation issues.
- The site is not considered a priority for preservation as agricultural land, with urban expansion viewed as inevitable with minimal loss of agricultural potential.

The assessment concludes that due to the site's small size and poor soil conditions, the site has no significant agricultural value and that development would result in minimal loss of agricultural potential,

making it suitable for alternative land uses. The proposed project can be authorized from an agricultural impact perspective, with implementation of the recommended mitigation measures. Recommended mitigation measures include managing site establishment and earthworks to avoid erosion and aquifer pollution, controlling hazardous materials and spills, training staff on pollution and fire prevention, and developing a stormwater management plan.

SECTION H: ALTERNATIVES, METHODOLOGY AND ASSESSMENT OF ALTERNATIVES

1. Details of the alternatives identified and considered

| | |
|---|--|
| 1.1. | Property and site alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts. |
| Provide a description of the preferred property and site alternative. | |
| The proposed site, Portion 16 of Farm No. 20 Klein Dassenberg, is the only site considered. No property or site alternatives were considered since the proposed development entails the rezoning and subdivision of the property for the development of the shopping centre. | |
| Provide a description of any other property and site alternatives investigated. | |
| No other property or site alternatives were investigated. | |
| Provide a motivation for the preferred property and site alternative including the outcome of the site selection matrix. | |
| The Applicant has identified this strategic location for exclusive shopping centre development. No alternative land uses have been considered for this site, as the applicant is committed to delivering retail facilities that will serve the local and regional community. The development represents a focused approach to addressing retail service gaps in the Atlantis area. | |
| Provide a full description of the process followed to reach the preferred alternative within the site. | |
| No other property or site alternatives were investigated | |
| Provide a detailed motivation if no property and site alternatives were considered. | |
| The Applicant owns the property. No other property or site alternatives were investigated as the proposal is specific to the site. | |
| List the positive and negative impacts that the property and site alternatives will have on the environment. | |
| There are no property or site alternatives. The proposed development is the only and preferred activity alternative, and the positive and negative impacts associated with the activity are as follows: | |
| <p>Positive impacts:</p> <ul style="list-style-type: none"> • Creation of local employment opportunities during construction and in operational phase; • No impact on any mapped aquatic features (as confirmed by the aquatic specialist); • No impact on biodiversity (as confirmed by the Biodiversity specialist); and • Improved public infrastructure. <p>Negative impacts:</p> <ul style="list-style-type: none"> • Clearance of indigenous vegetation; • Loss of agricultural land; • Potential for erosion through increased stormwater discharge off hard surfaces; and • Short term impact on environs and sense of place during construction. | |
| 1.2. | Activity alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts. |
| Provide a description of the preferred activity alternative. | |
| The preferred activity alternative involves rezoning and subdividing the site for the shopping centre development. While the property is currently zoned for agriculture its long-term agricultural potential is limited due to its small size and water constraints. The development will bring in much needed economic stimulus into the community. | |
| Provide a description of any other activity alternatives investigated. | |
| No activity alternatives was explored for this property. | |
| Provide a motivation for the preferred activity alternative. | |
| The site is increasingly being impacted due to increasing anthropogenic activities. Its small size (8.5 ha) limits economies of scale, and its agricultural potential is constrained by external factors. The rezoning and subdivision for the shopping centre provides a more viable long-term use. | |
| Provide a detailed motivation if no activity alternatives exist. | |

The Applicant owns the property and wishes to develop the site as a shopping centre development. As such no other activities were considered.

List the positive and negative impacts that the activity alternatives will have on the environment.

There are no property or activity alternatives.

1.3. Design or layout alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts

Provide a description of the preferred design or layout alternative.

The proposed development will be laid out as depicted in the Site Development Plan. There will be an anchor shop with various line shops with provision made for the possible future extension of the anchor shop.

Ample parking is provided for with a total of 605 bays to meet anticipated demand. It is proposed that the internal roads and parking areas incorporate permeable paving, particularly in the eastern sections of the site, to support effective stormwater management in accordance with City of Cape Town requirements. The southern parking area may include lawned surfaces for overflow parking, and all internal road and parking layouts will comply with the City's minimum standards for commercial developments.

Primary access for vehicles will be from Saxonwold Drive (R304), which serves as the main arterial road, with a dedicated entrance and exit point designed to accommodate high traffic volumes safely and efficiently. A secondary access point is proposed off Reygersdal Drive to facilitate service vehicle movement and ease internal circulation. Both entry and exit points will be clearly marked, with appropriate signage and traffic calming measures to reduce conflict, manage flow, and ensure safe access for shoppers, public transport users, and delivery vehicles.

In terms of the layout, access to the site will be from two access points:

- 1) Main Entrance (Gate 1) from R304 main road
- 2) Secondary Entrance (Gate 2) from Saxonwold Road

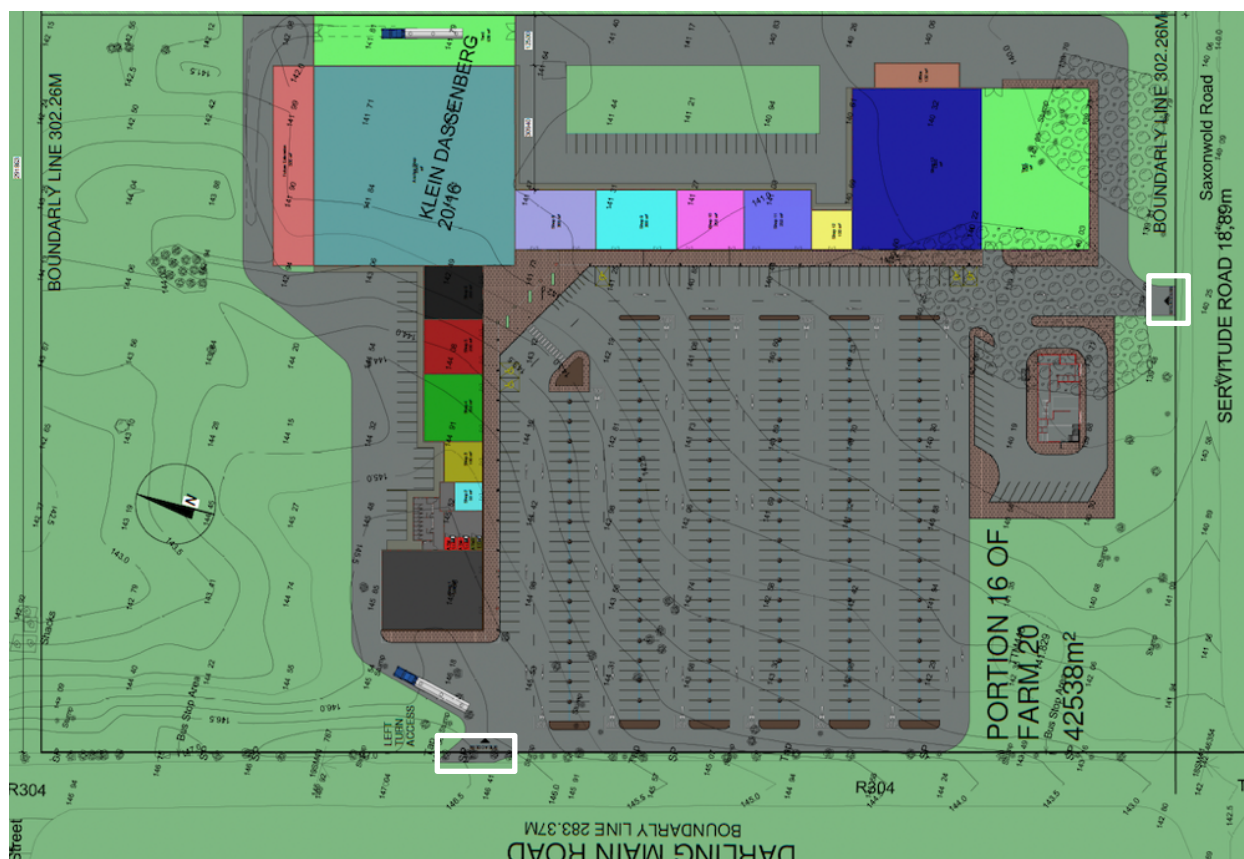


Figure 16: Site access (see white box) from R304 (Gate 1) and Saxonwold Road (Gate 2)

Provide a description of any other design or layout alternatives investigated.

The proposed development will be constructed away from the historic Blue gum avenue of trees. A buffer will be maintained between the tree avenue and the proposed development.

Existing gaps within the historic tree lane will be considered in the final layout of the access/egress point on the Western boundary of the property.



Figure 17 showing the gaps (depicted by arrows) between the Blue Gum trees that will be explored for access/egress points

Provide a motivation for the preferred design or layout alternative.

The proposed north-western layout is the preferred configuration based on optimal site utilization and proven design principles for low-income community retail centres. This layout concentrates development on only 20% of the 8.5-hectare property, ensuring minimal environmental impact while maximizing accessibility to the R304. The anchor tenant positioning creates optimal customer flow patterns, while line shops along covered walkways ensure maximum visibility and circulation. The site coverage demonstrates environmental responsibility while allowing future expansion and maintaining rural character.

Provide a detailed motivation if no design or layout alternatives exist.

N/A

List the positive and negative impacts that the design alternatives will have on the environment.

Refer to Section H4 below for a list of all the positive and negative impacts assessed.

1.4. Technology alternatives (e.g., to reduce resource demand and increase resource use efficiency) to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.

Provide a description of the preferred technology alternative:

The only technological alternatives considered, were the use of electricity and water conservation.

Electricity:

- Use of energy efficient equipment;
- CFL's must be used to save energy cost where possible;
- Fluorescent lighting must be used in communal spaces where possible.
- Use of generator or solar power as a backup.

The only technological alternatives considered, for water conservation are:

- Ensure that toilet systems are dual flush and 6 litre water holding capacity.

| | |
|---|---|
| <ul style="list-style-type: none"> Water saving and low flow devices to be used on all fittings. Recommended for rainwater harvesting or re-use of water for irrigation. | |
| Provide a description of any other technology alternatives investigated. | |
| No other technology alternatives were considered. | |
| Provide a motivation for the preferred technology alternative. | |
| Development will be in accordance with existing standards and guidelines applicable which will, through implementation of the EMPr (Appendix H), have the least impact. No technology alternatives have been considered for the operational phase. | |
| While no technology alternatives have been considered, the applicant will be encouraged to incorporate energy saving technologies into the design of the shopping centre by, for example, installing alternative power sources such as a generator or solar system, rainwater harvesting for irrigation, and energy efficient lighting. | |
| Provide a detailed motivation if no alternatives exist. | |
| No other technology alternatives were considered. | |
| List the positive and negative impacts that the technology alternatives will have on the environment. | |
| Both electricity and water availability and supply are under constraint. The technological alternatives will ensure that the development is more energy and water efficient. | |
| 1.5. | Operational alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts. |
| Provide a description of the preferred operational alternative. | |
| There are no operational alternatives considered for this development as it entails the proposed rezoning and subdivision of Farm 20 Klein Dassenberg for the purposes of developing a shopping centre. | |
| Provide a description of any other operational alternatives investigated. | |
| There are no operational activity alternatives. | |
| Provide a motivation for the preferred operational alternative. | |
| There are no operational activity alternatives. | |
| Provide a detailed motivation if no alternatives exist. | |
| There are no operational activity alternatives. | |
| List the positive and negative impacts that the operational alternatives will have on the environment. | |
| There are no operational activity alternatives. | |
| 1.6. | The option of not implementing the activity (the 'No-Go' Option). |
| Provide an explanation as to why the 'No-Go' Option is not preferred. | |
| The 'No-Go' option will result in the status quo being maintained. The property is currently used for illegal dumping and a portion thereof as an informal taxi rank. Without development, these activities are likely to continue or even increase, further degrading the property and potentially leading to environmental issues and higher maintenance costs. | |
| The site could also potentially be annexed by the adjacent community which has seen an increase in informal settlements. | |
| 1.7. | Provide an explanation as to whether any other alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts, or detailed motivation if no reasonable or feasible alternatives exist. |
| No other alternatives have been investigated and considered as part of this assessment process. | |
| 1.8. | Provide a concluding statement indicating the preferred alternatives, including the preferred location of the activity. |
| There are two alternatives being considered for this project. | |
| <ol style="list-style-type: none"> The preferred alternative is the proposed development as discussed under Section B 4.4 "No-go" option as discussed under Section H. | |

Option 1 is the preferred alternative as it provides the local community with employment opportunities and economic stimulus in an area that has historically been racially segregated. The Witsand community will benefit from the commercial activity along the R304 "Activity Corridor".

2. "No-Go" areas

Explain what "no-go" area(s) have been identified during identification of the alternatives and provide the co-ordinates of the "no-go" area(s).

The only area that has been identified is the Eucalyptus tree avenue however the development will be set back significantly from the road reserve. Any vehicular ingress/egress points along the Western boundary will be located at existing gaps of the tree line.

3. Methodology to determine the significance ratings of the potential environmental impacts and risks associated with the alternatives.

Describe the methodology to be used in determining and ranking the nature, significance, consequences, extent, duration of the potential environmental impacts and risks associated with the proposed activity or development and alternatives, the degree to which the impact or risk can be reversed and the degree to which the impact and risk may cause irreplaceable loss of resources.

This section compiles the impact assessment criteria and methodology for the assessment of each impact and risk identified for each alternative. The methodology is based on international and national standards adapted from the Agricultural Impact Assessment protocol, DEAT (2006) Guideline 5: Assessment of Alternatives and Impacts in support of the Environmental Impact Assessment Regulations, 2006. Integrated Environmental Management Guideline Series, Department of Environmental Affairs and Tourism (DEAT), Pretoria. and aligned with NEMA requirements.

1. Impacts:

Different types of impacts may occur from the undertaking of an activity. The impacts may be positive or negative and may be categorized as being direct (primary), indirect (secondary) or cumulative impacts.

Direct impacts are impacts that are caused directly by the activity and generally occur at the same time and at the place of the activity.

Indirect impacts of an activity are indirect or induced changes that may occur as a result of the activity.

Cumulative impacts are impacts that result from the incremental impact of the proposed activity on a common resource when added to the impacts of other past, present or reasonably foreseeable future activities.

2. The following criteria is taken into consideration:

- nature of the impact i.e. positive, negative, direct, indirect.
- extent and location of the impact.
- duration of the impact i.e. short term, long term, intermittent or continuous.
- magnitude/intensity of the impact i.e. high, medium, low.
- likelihood or probability of the impact actually occurring.
- extent to which the impact can be reversed.
- degree to which an impact may cause irreplaceable loss of a resource.
- cumulative impacts.
- mitigatory potential of impacts; and
- significance of the impact on a local, regional or global level.

3. Nature of the type of impact (i.e. degrading or improving):

- Positive Impact or
- Negative Impact.

4. Extent

| Extent Description | |
|----------------------|--|
| International | Effect will occur across international borders |
| National | Effect will occur across the country |
| Regional | Effect will occur across the region/province |
| Local | Effect will occur at a local level |
| Immediate | Site and immediate surroundings |

5. Duration

| Duration Description | |
|------------------------------------|---|
| Permanent: No Mitigation | - Impact will remain long after the life of the project. Impact is irreversible even with management. |
| Project lifetime and beyond | - Impact will remain beyond project lifetime but is potentially reversible with intensive management. |
| Project lifetime | Impact will remain for the duration of the project. |
| Long term | 6-15 years |
| Medium term | 1-5 years |
| Short term | Less than 1 year |

6. Probability

| Probability Description | |
|--------------------------|---|
| Certain/Definite | There are sound scientific reasons to expect that the impact will definitely occur. |
| Highly Probable | High likelihood of occurrence. |
| Probable | Reasonable likelihood of occurrence. |
| Unlikely/Possible | Medium to low likelihood of occurrence. |
| Rare/Improbable | Low likelihood of occurrence. |

7. Significance Rating Classification

| Significance Description | |
|--------------------------|--|
| Very Low | where natural, cultural and social functions and processes are |

| | |
|----------------|---|
| | essentially unaffected or insignificantly affected |
| Low | where natural, cultural and social functions and processes are slightly affected |
| Low to Medium | where natural, cultural and social functions and processes are slightly affected causing a minor change in functions and processes but are still able to continue |
| Medium | where the affected environment is altered but natural, cultural and social functions and processes can continue |
| Medium to High | where natural, cultural and social functions and processes are altered and most likely the impact will not allow functions and processes to continue, but in some cases, the function or process may continue |
| High | where the affected environment is altered but natural, cultural and social functions and processes are altered to the extent that it will temporarily or permanently cease |

8. Reversibility

| | |
|----------------------|---|
| Irreversible | The activity will lead to an impact that is permanent |
| Partially reversible | The impact is reversible to a degree e.g. acceptable re-vegetation measures can be implemented but the pre-impact species composition and/or diversity may never be attained. Impacts may be partially reversible within a short (during construction), medium (during operation) or long term (following decommissioning) timeframe. |
| Fully reversible | The impact is fully reversible, within a short-, medium- or long-term timeframe |

4. Assessment of each impact and risk identified for each alternative

Note: The following table serves as a guide for summarising each alternative. The table should be repeated for each alternative to ensure a comparative assessment. The EAP may decide to include this section as Appendix J to this BAR.

REFER TO APPENDIX J – ASSESSMENT AND RANKING OF IMPACTS

| | |
|---|--|
| Alternative: | |
| PLANNING, DESIGN AND DEVELOPMENT PHASE | |
| Potential impact and risk: | |
| Nature of impact: | |
| Extent and duration of impact: | |
| Consequence of impact or risk: | |
| Probability of occurrence: | |
| Degree to which the impact may cause irreplaceable loss of resources: | |
| Degree to which the impact can be reversed: | |
| Indirect impacts: | |
| Cumulative impact prior to mitigation: | |
| Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High) | |
| Degree to which the impact can be avoided: | |
| Degree to which the impact can be managed: | |
| Degree to which the impact can be mitigated: | |
| Proposed mitigation: | |
| Residual impacts: | |
| Cumulative impact post mitigation: | |

| | |
|--|--|
| Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High) | |
| OPERATIONAL PHASE | |
| Nature of impact: | |
| Extent and duration of impact: | |
| Consequence of impact or risk: | |
| Probability of occurrence: | |
| Degree to which the impact may cause irreplaceable loss of resources: | |
| Degree to which the impact can be reversed: | |
| Indirect impacts: | |
| Cumulative impact prior to mitigation: | |
| Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High) | |
| Degree to which the impact can be avoided: | |
| Degree to which the impact can be managed: | |
| Degree to which the impact can be mitigated: | |
| Proposed mitigation: | |
| Residual impacts: | |
| Cumulative impact post mitigation: | |
| Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High) | |
| DECOMMISSIONING AND CLOSURE PHASE | |
| Potential impact and risk: | |
| Nature of impact: | |
| Extent and duration of impact: | |
| Consequence of impact or risk: | |
| Probability of occurrence: | |
| Degree to which the impact may cause irreplaceable loss of resources: | |
| Degree to which the impact can be reversed: | |
| Indirect impacts: | |
| Cumulative impact prior to mitigation: | |
| Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High) | |
| Degree to which the impact can be avoided: | |
| Degree to which the impact can be managed: | |
| Degree to which the impact can be mitigated: | |
| Proposed mitigation: | |
| Residual impacts: | |
| Cumulative impact post mitigation: | |
| Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High) | |

SECTION I: FINDINGS, IMPACT MANAGEMENT AND MITIGATION MEASURES

| | |
|--|---|
| 1. | Provide a summary of the findings and impact management measures identified by all Specialist and an indication of how these findings and recommendations have influenced the proposed development. |
| 1.1 TRAFFIC IMPACT ASSESSMENT: <p>The traffic impact is mostly insignificant, except for Intersection 3 which is operating at a poor level of service (LOS E or worse) in all scenarios analysed. This will require the implementation of a traffic circle at intersection 3 which will improve the operating conditions.</p> <p>The need for public transport is high since vehicle ownership in the surrounding area is low and most people make use of busses, taxis or walk. Pedestrian facilities and public transport (minibus taxi) facilities</p> | |

need to be provided at the development site. Accommodation has been made for a taxi rank on the development site. Pedestrian facilities must be provided when the development is implemented. Raised kerb sidewalks must be provided to the immediate adjacent streets.

The minimum requirements for parking dimensions are well met with ample space available. It is therefore recommended that the proposed development be considered for approval, from a traffic point of view.

Refer to the Traffic Impact Assessment included in Appendix G4.

1.2 HERITAGE ANCILLIARY REPORT:

Of significance is the historic Eucalyptus tree avenue prevailing on either side of the R304. The site also abuts the proposed Atlantis Development Focus Area, one of the areas proposed by the City of Cape Town for increased development activity as well as for exemption of certain provisions of the NHR Act, most notably Sections 34 and 38. Pleistocene fossil bones have been found within the nearby Koeberg Nature Reserve however none has been identified at the proposed site. The site is of no obvious social significance.

The proposed development will not physically affect the treeline as it will be set back significantly from the road reserve. Any vehicular ingress/egress points along the western boundary of the site will be located at existing gaps in the tree line, and any other gaps will be rehabilitated by active planting of Eucalyptus sp.

In the event that archaeological material or human burials are found, these have to be reported to Heritage Western Cape and the SAPS, as appropriate.

Refer to the Ancillary information report, Appendix G2, that was submitted with the Notice of Intent.

1.3 AQUATIC COMPLIANCE STATEMENT:

The project site investigated comprises of "old land" previously cultivated and previously developed. The site has been significantly disturbed and transformed from its natural state and is infested with alien vegetation. This is further exacerbated by the informal use of the site as a taxi rank on its south westerly border. The site has also been affected by illegal dumping from the informal settlement that has arisen within the Witsand community.

No wetlands nor distinct watercourses exist within the property boundary. Site soils were profiled and revealed no mottling of soils although some limited organics were found close to the soil surface (i.e. past site cultivation). No obligate wetland vegetation was found during the site ground-truth investigation.

It is recommended that:

- A geotechnical study should be conducted to inform the site structural development planning, and;
- A site stormwater management plan is developed to ensure that site drainage is formally controlled.

Refer to the Aquatic Biodiversity Compliance Statement included in Appendix G5.

1.4 TERRESTRIAL BIODIVERSITY ASSESSMENT:

Based on field observations conducted, it is concluded that the site is almost entirely transformed. The ecosystem is in a poor condition due to past farming activities and current disturbances (i.e. wood burning, dumping of solid waste, informal taxi rank) therefore the remnant plant cover is far from representative of Atlantis Sand Fynbos. Despite the habitat disturbances, it still offers a suitable environment for indigenous species.

The following was noted:

- No species of conservation concern was found.
- No faunal species of conservation concern was found.
- Loss of vegetation and ecosystem functioning will occur however no significant loss of the ecosystem type.
- No biodiversity constraints have been identified that would prevent the approval of the proposed development.

It is recommended that an indigenous garden is established once the development has been completed.

Refer to the Terrestrial Biodiversity Specialist Assessment Report included in Appendix G3.

1.5 AGRICULTURAL IMPACT ASSESSMENT:

The NEMA Screening tool identifies this land as being of medium agricultural significance. The site has also been identified as being an agricultural area of significance as per the latest MSDP however based on the assessment conducted, the site is deemed as having a low agricultural potential. This is based on the assessment of the land capability which resulted in a "iv" land capability rating which implies marginal to moderately potential arable land. Historically the site was used for some form of agroindustry (possibly a hatchery as is evident from the images) but subsequent to 2003, this was decommissioned and the site fell fallow.

In addition to this, the project site is situated within the Atlantis Coastal Plain, which is characterized by sandy soils that are generally not suitable for agriculture, thus the area is regarded as undesirable for most agricultural activities (Atlantis Foundries Draft EIA Report, 2015).

A limiting factor for agriculture in the greater Atlantis area is the availability of water. To address this, the Municipality has resorted to tapping into the receiving regional aquifer but also recycling of treated water and desalination in order to augment its water supply services mix.

Due to the lower average rainfall experienced in the Western Cape, the province in general is regarded as very limited in respect to its grazing capacity or the ability for the land to sustainably undertake stock farming. The size of the property also limits its ability to be used for stock farming.

The proposed development would permanently exclude the possibility of future agricultural production on the site. However, farming on the site faces significant economic constraints, including soil limitations, limited irrigation, water availability, and the threat of land grabs, establishment of an informal taxi rank and the use of the site for illegal dumping. Due to these factors, farming is likely to become increasingly unviable in the future, regardless of whether the development proceeds. Consequently, the site's agricultural value is low, and it is not considered a priority for preservation as

agricultural land. Urban expansion onto the site is seen as inevitable and would not result in a significant loss of agricultural potential.

The following Impact Management measures have been identified:

- Site establishment, earthworks, heavy machinery and construction vehicles must be managed to avoid undue erosion and pollution to the receiving aquifer.
- The use of hazardous materials must be avoided as much as possible, and where required, must be properly managed and controlled to prevent site pollution.
- Measures to prevent and respond to hydrocarbon spills and site pollution incidents must be implemented, including having spill kits available and following reporting procedures.
- In the event of soil contamination, emergency procedures must be followed and the incident reported to local and national authorities within 24 hours. Remediation measures should be implemented.
- Construction and operations staff must be trained on pollution and fire prevention best practices.
- Construction and operations waste must be appropriately managed by professional waste service providers.
- Dust and site-generated debris must be controlled.
- Impermeable and bunded surfaces must be used for storage tanks and vehicle parking.
- A comprehensive stormwater management plan is highly recommended as a key mitigation measure.

The conclusion of this assessment is therefore that the proposed development will not have an unacceptable negative impact on the agricultural production capability of the site. The proposed development is therefore acceptable from an agricultural impact point of view, and it is recommended that it be approved.

Refer to the Agricultural Assessment report in Appendix G6.

| | |
|---|--|
| 2. | List the impact management measures that were identified by all Specialist that will be included in the EMPr |
| <p>Management measures:</p> <ul style="list-style-type: none"> • Site establishment, earthworks, heavy machinery and construction vehicles must be managed to avoid undue erosion and pollution to the receiving aquifer. • The use of hazardous materials must be avoided as much as possible, and where required, must be properly managed and controlled to prevent site pollution. • Measures to prevent and respond to hydrocarbon spills and site pollution incidents must be implemented, including having spill kits available and following reporting procedures. • In the event of soil contamination, emergency procedures must be followed and the incident reported to local and national authorities within 24 hours. Remediation measures should be implemented. • Construction and operations staff must be trained on pollution and fire prevention best practices. • Construction and operations waste must be appropriately managed by professional waste service providers. • Dust and site-generated debris must be controlled. • Impermeable and bunded surfaces must be used for storage tanks and vehicle parking. • A comprehensive stormwater management plan is highly recommended as a key mitigation measure. • Establishment of an indigenous garden. | |
| 3. | List the specialist investigations and the impact management measures that will not be implemented and provide an explanation as to why these measures will not be implemented. |
| All impact management measures recommended will be included in the EMPr. | |
| 4. | Explain how the proposed development will impact the surrounding communities. |

The proposed development possesses the capacity to influence the neighbouring community throughout the construction phase. Common effects linked to construction, such as noise, dust, increased traffic, and visual disturbances, may affect the nearby community but can be effectively alleviated through the application of the Environmental Management Plan (EMPr), as detailed in Appendix H.

Moreover, the surrounding communities will benefit from the development through employment opportunities during the construction and operational phases which will improve the standard of living of those employed and provide skills development to those individuals. It also creates new business opportunities for small businesses who want to expand their operations.

Revenue accruing to the local authorities and an increase in the perceived value of surrounding properties are associated with the proposed development.

| | |
|----|--|
| 5. | Explain how the risk of climate change may influence the proposed activity or development and how has the potential impacts of climate change been considered and addressed. |
|----|--|

The risk of climate change is not expected to influence the proposed development

| | |
|----|---|
| 6. | Explain whether there are any conflicting recommendations between the specialists. If so, explain how these have been addressed and resolved. |
|----|---|

There are no conflicting recommendations between the specialists.

| | |
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| 7. | Explain how the findings and recommendations of the different specialist studies have been integrated to inform the most appropriate mitigation measures that should be implemented to manage the potential impacts of the proposed activity or development. |
|----|--|

The mitigation measures and recommendations of the specialist studies are considered the most appropriate mitigation measures. The recommendations have been incorporated into this report and the EMPr.

| | |
|----|---|
| 8. | Explain how the mitigation hierarchy has been applied to arrive at the best practicable environmental option. |
|----|---|

The principles of Environmental Management has been implemented throughout this process. Where negative impacts has been identified, these have been prevented and where it has not been possible to prevent it, mitigation measures have been identified that aim to minimise these negative impacts.

The Mitigation Hierarchy that has been applied are as follows:

- Avoid or Prevent:
- Minimise:
- Rehabilitate:
- Offset: No biodiversity offsets are required.

SECTION J: GENERAL

1. Environmental Impact Statement

| 1.1. | Provide a summary of the key findings of the EIA. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|---|----------------------------|---|--|--|------------------|---------------------|--|--------------------|-----------------|----------------------------|--|--|---------------------------|-----|----------------|-------------------------------|--------------|------------------------|-------------------------|--------------|------------------------|-------------------------------|--------------|------------|----------------------------|--------------|------------------------|-------------------------------------|--|--|--------------------------|-----|--------------|--------------------|--------------|----------------------------|---------------|--------------|----------------------------|------------------|--------------|----------------------------|
| <p>Site Condition:</p> <ul style="list-style-type: none"> The project site has been significantly disturbed and transformed from its natural ecosystem due to past development. Further deterioration has occurred from informal use and alien vegetation invasion. The site is classified as severely disturbed and severely transformed. <p>Aquatic Environment:</p> <ul style="list-style-type: none"> No wetlands or distinct watercourses were found on the project site. Soil profiling revealed no mottling, though some limited organics were found near the surface from past cultivation. No obligate wetland vegetation was identified during ground-truth investigations. <p>Agricultural Sensitivity:</p> <ul style="list-style-type: none"> The project site is classified as having medium sensitivity for agricultural resources according to the NEMA Screening Tool. Land capability falls within a Low-Moderate Land Capability Class with metric scores ranging from 06 to 08. The project site has low agricultural potential due to the project property size and soil condition. Agricultural impacts are assessed as negligible to minor negative and can be effectively mitigated. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1.2. | Provide a map that that superimposes the preferred activity and its associated structures and infrastructure on the environmental sensitivities of the preferred site indicating any areas that should be avoided, including buffers. (Attach map to this BAR as Appendix B2) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| No environmental sensitivities have been identified. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1.3. | Provide a summary of the positive and negative impacts and risks that the proposed activity or development and alternatives will have on the environment and community. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>A. Preferred alternative</p> <table border="1"> <thead> <tr> <th colspan="3">PLANNING, DESIGN AND CONSTRUCTION PHASE</th> </tr> <tr> <th rowspan="2">POTENTIAL IMPACT</th> <th colspan="2">SIGNIFICANCE RATING</th> </tr> <tr> <th>WITHOUT MITIGATION</th> <th>WITH MITIGATION</th> </tr> </thead> <tbody> <tr> <td colspan="3">Biophysical aspects</td> </tr> <tr> <td>Loss of agricultural land</td> <td>Low</td> <td>Not applicable</td> </tr> <tr> <td>Loss of indigenous vegetation</td> <td>Low negative</td> <td>Very low to negligible</td> </tr> <tr> <td>Loss of aquatic habitat</td> <td>Low negative</td> <td>Very low to negligible</td> </tr> <tr> <td>Disturbance of faunal species</td> <td>Low negative</td> <td>Negligible</td> </tr> <tr> <td>Loss of heritage resources</td> <td>Low negative</td> <td>Very low to negligible</td> </tr> <tr> <td colspan="3">Construction related aspects</td> </tr> <tr> <td>Employment opportunities</td> <td>Low</td> <td>Low positive</td> </tr> <tr> <td>Soil contamination</td> <td>Low negative</td> <td>Low negative to negligible</td> </tr> <tr> <td>Dust nuisance</td> <td>Low negative</td> <td>Low negative to negligible</td> </tr> <tr> <td>Waste management</td> <td>Low negative</td> <td>Low negative to negligible</td> </tr> </tbody> </table> | | | PLANNING, DESIGN AND CONSTRUCTION PHASE | | | POTENTIAL IMPACT | SIGNIFICANCE RATING | | WITHOUT MITIGATION | WITH MITIGATION | Biophysical aspects | | | Loss of agricultural land | Low | Not applicable | Loss of indigenous vegetation | Low negative | Very low to negligible | Loss of aquatic habitat | Low negative | Very low to negligible | Disturbance of faunal species | Low negative | Negligible | Loss of heritage resources | Low negative | Very low to negligible | Construction related aspects | | | Employment opportunities | Low | Low positive | Soil contamination | Low negative | Low negative to negligible | Dust nuisance | Low negative | Low negative to negligible | Waste management | Low negative | Low negative to negligible |
| PLANNING, DESIGN AND CONSTRUCTION PHASE | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| POTENTIAL IMPACT | SIGNIFICANCE RATING | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | WITHOUT MITIGATION | WITH MITIGATION | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Biophysical aspects | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Loss of agricultural land | Low | Not applicable | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Loss of indigenous vegetation | Low negative | Very low to negligible | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Loss of aquatic habitat | Low negative | Very low to negligible | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Disturbance of faunal species | Low negative | Negligible | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Loss of heritage resources | Low negative | Very low to negligible | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Construction related aspects | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Employment opportunities | Low | Low positive | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Soil contamination | Low negative | Low negative to negligible | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Dust nuisance | Low negative | Low negative to negligible | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Waste management | Low negative | Low negative to negligible | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| | | |
|-----------------------------------|-------------------------|----------------------------|
| Traffic flow | Low negative | Low negative |
| OPERATIONAL PHASE | | |
| Employment opportunities | Medium to High positive | N/A |
| Influx of traffic | High negative | Medium negative |
| Noise nuisance | Low negative | Low negative to negligible |
| Contaminated stormwater | Medium negative | Low negative |
| Contamination due to sewage leaks | Medium negative | Low negative |

B. No – go option

| PLANNING, DESIGN AND CONSTRUCTION PHASE | | |
|--|----------------------------|------------------------|
| POTENTIAL IMPACT | SIGNIFICANCE RATING | |
| | WITHOUT MITIGATION | WITH MITIGATION |
| No impact | Low | Low |

2. Recommendation of the Environmental Assessment Practitioner (“EAP”)

| | |
|--|--|
| 2.1. | Provide Impact management outcomes (based on the assessment and where applicable, specialist assessments) for the proposed activity or development for inclusion in the EMPr |
| <p>PRE-DEVELOPMENT PHASE:</p> <ul style="list-style-type: none"> a) Site demarcation and site establishment: the development footprint must be kept to demarcated site area to avoid any impacts to the surrounding environment. b) Demarcation of No-Go areas c) Access roads: Minimise impact to the environment by only using planned access to the site. d) Fencing: Ensure safe and controlled access to the site through the erection of fencing and gates where required. e) Site facilities: Provide clean toilet facilities, eating areas and potable water to all staff to minimise the risk of disease and impact to the environment and health impacts. <p>CONSTRUCTION PHASE:</p> <ul style="list-style-type: none"> a) Workshop, equipment maintenance and storage areas: Proper storage of fuel and lubricants to minimise soil, surface water and groundwater contamination. b) Site establishment, Earthworks, heavy machinery and all construction vehicles must be mindful of undue site erosion and pollution to the receiving aquifer. c) The use of hazardous materials must be avoided as far as possible and where required to be managed and controlled appropriately in order to avoid any site pollution. d) Hydrocarbon spills and site pollution must be avoided (i.e. reduce the likelihood of accidents). e) In the event of soil contamination suitable emergency procedures must be followed and reported to the local and national authorities within 24 hours of the incident occurring (i.e. municipality and department of water and sanitation). The response should include the suitable use and availability of spill kits, drip trays, plastic and other sheeting to absorb and control and remedy the incident as far as possible and to report on the matter after the correct procedure (i.e. report contaminated land, land contamination registry, remedy contamination). f) Construction and operations staff must be trained and made aware of pollution and fire prevention best practise protocols. g) Construction and operations based waste must be managed appropriately by the use of professional service providers (i.e. waste disposal certificate). h) Dust and site generated debris must be controlled. i) Impermeable and suitably bunded surfaces must be used for storage tanks and standing vehicles j) Site safety and security: All safety and security measures are in place. | |

- k) Public safety: All precautions are taken where possible to minimise the risk of injury, harm or complaints.

OPERATION PHASE:

- a) Water saving devices (dual flush systems) to be used.
- b) Energy efficient appliances to be used.
- c) Use of LED lighting
- d) Emergency response to include measures to address nuclear incidents

- 2.2. Provide a description of any aspects that were conditional to the findings of the assessment either by the EAP or specialist that must be included as conditions of the authorisation.

1. CONDITIONS BY THE EAP

1.1 An Environmental Control Officer (ECO) must be appointed to oversee the construction of the services infrastructure, (including the implementation of the EMPr (Appendix H) and any applicable conditions of the environmental authorisation. ECO monitoring (site visits) must be undertaken at least twice a month, until such time that the construction of the services infrastructure is completed.

All mitigation measures detailed in the EMPr (Appendix H) must be adhered to.

1.2 Compliance with an approved Environmental Management Programme (EMPr).

1.3 Final design and layout to take into account the Blue gum tree avenue on the Western side of the property.

2. CONDITIONS BY HWC:

Should any heritage resources, including evidence of graves and human burials, archaeological material and paleontological material be discovered during the execution of the activities above, all works must be stopped immediately, and HWC must be notified without delay.

- 2.3. Provide a reasoned opinion as to whether the proposed activity or development should or should not be authorised, and if the opinion is that it should be authorised, any conditions that should be included in the authorisation.

The EAP is of the opinion that this activity should be authorised, subject to the amendment of the urban edge to accommodate the proposed development. The proposed development is not expected to have any significant impacts on the receiving environment. All impacts identified can be mitigated to acceptable levels of significance. Despite the classification of the site as "An area of agricultural significance" according to the Municipal SDF, the site has been found to be of low agricultural value. The site is not able to sustain any form of agriculture.

A critical prerequisite for this authorisation is the formal amendment of the City's Urban Development Edge (UDE) to include the subject property, Portion 16 of Farm Klein Dassenberg No. 20. Currently, the site remains outside the City's defined Urban Edge, and development applications in such areas are treated with caution, particularly in Discouraged Growth Areas. However, the realities on the ground justify a policy exception or amendment to the urban edge, based on:

- The proximity to the urban footprint of Atlantis (Witsand community lies immediately adjacent)
- The extensive disturbance of the site from past farming, dumping, and informal activity, rendering it unsuitable for conservation or continued agricultural use
- The development's alignment with the principles of smart growth, densification, and spatial justice, all key themes in the City's spatial transformation agenda
- The public benefits to be derived from this proposal – job creation, improved access to retail and services, and infrastructure upgrades

The potential socio-economic benefits presented to an area and individuals which are experiencing the ill effects of high unemployment rates in an area that has historically been marginalised, is undeniably important but a serious need. This development addresses that need and provides the opportunity for the community to grow and improve their sense of place.

Positive outcomes include:

- Fulfilling community needs with accessible shopping and dining options
- Employment opportunities and skills development
- Contributing to the local economy and helping to retain valuable spend in the area

These benefits are expected to be sustainable and have lasting effects on the region.

It is crucial to ensure that the development does not compromise the health of agricultural or ecological systems, or heritage items in the vicinity. Post-construction rehabilitation efforts should aim to leave surrounding agricultural and natural environments in equal or improved conditions. Alien plant and land management initiatives initiated during construction should be maintained throughout the construction defects liability and operational phases.

The EMPr contains the recommendation of the specialists and commenting authorities and must be implemented during the construction phase and must form part of the tender documents.

The preferred alternative, Alternative 1, is recommended for authorisation, with adherence to the mitigation measures recommended by specialists and as provided in this report.

Should the project receive a positive decision on Environmental Authorization, the Environmental Assessment Practitioner (EAP) recommends that the following conditions be included in the Department's decision, in order to ensure that the transfer of legal responsibilities can be appropriately transferred:

Urban Edge Amendment Condition: Prior to the commencement of any development activities, the Authorization Holder must obtain formal confirmation from the City of Cape Town that the Urban Development Edge has been amended to include the subject property within the urban footprint. This amendment must be formally approved and gazetted before any construction activities may begin.

Construction Phase Conditions: During the construction phase, it is recommended that the Authorization Holder appoint a competent independent Environmental Control Officer (ECO) to monitor and report on the contractor(s) compliance with the conditions contained within the Environmental Authorization & Environmental Management Programme (EMPr).

Monitoring audits and reporting should take place on a monthly basis during the construction phase and a closeout audit must be undertaken post rehabilitation of areas affected by construction activities.

The EMPr for the development is to be implemented and audited on a regular basis during construction. Method statements must be compiled for all activities listed in the Environmental Management Plan as required.

All of the above recommendations have been incorporated into the EMPr where necessary (Appendix F) which must be approved and implemented for the construction phase of the project.

| | |
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| 2.4. | Provide a description of any assumptions, uncertainties and gaps in knowledge that relate to the assessment and mitigation measures proposed. |
| <p>ASSUMPTIONS:</p> <ul style="list-style-type: none"> It is assumed that all the information provided in this report and on which the report is based is correct and valid at the time receipt thereof. It is assumed that the proposed mitigation measures, as listed in this report and the EMPr (Appendix H), will be implemented and adhered to by all the relevant stakeholders involved. <p>GAPS</p> <p>At this stage, there are no gaps in knowledge within this report.</p> | |
| 2.5. | The period for which the EA is required, the date the activity will be concluded and when the post construction monitoring requirements should be finalised. |
| <p>VALIDITY OF THE EA</p> <p>It is anticipated that the construction will take more than five (5) years to be completed; therefore, it is recommended that the EA (if granted) be valid for at least ten (10) years from the date of issue.</p> <p>COMPLIANCE MONITORING</p> <p>The Developer and Contractor(s) will be responsible for monitoring all construction activities on a day-to-day basis to ensure compliance with the EMPr, EA (if granted) and other applicable environmental-related approvals and/or permits, throughout the construction phase of the development.</p> | |

3. Water

| | |
|--|--|
| Since the Western Cape is a water scarce area explain what measures will be implemented to avoid the use of potable water during the development and operational phase and what measures will be implemented to reduce your water demand, save water and measures to reuse or recycle water. | |
| <p>CONSTRUCTION PHASE</p> <ul style="list-style-type: none"> Non-potable water will be used to wash equipment, dust suppression and for use where suitable in construction activities. <p>OPERATIONAL PHASE</p> <p>The following water-saving measures are recommended, where feasible:</p> <ul style="list-style-type: none"> Water saving/reducing devices such as dual or low flush toilets, and low flow showerheads. Recycling of water is also recommended. | |

4. Waste

| | |
|--|--|
| Explain what measures have been taken to reduce, reuse or recycle waste. | |
| During the construction phase, an integrated waste management system will be adopted, which includes waste minimization, waste recycling and the proper storage and disposal of waste, which does not impact the health of the environment and human health. | |

5. Energy Efficiency

| | |
|--|--|
| 8.1. | Explain what design measures have been taken to ensure that the development proposal will be energy efficient. |
| <p>It is recommended that the use of alternative energy is considered to minimise the load on the electricity supply.</p> <p>Alternative energy-saving measures recommended where viable include:</p> <ul style="list-style-type: none"> Solar heating, heat pumps and/or pellet boilers will be considered for domestic water heating. Gas hobs instead of electrical hobs. Use of low-energy LED or CFL lighting. | |

SECTION K: DECLARATIONS

SECTION K: DECLARATIONS


DECLARATION OF THE APPLICANT

Note: Duplicate this section where there is more than one Applicant.

I, Mr Hasaninyan Ibrahim Velaskar, ID number, 6907125798082, in my personal capacity or duly authorised thereto hereby declare/affirm that all the information submitted or to be submitted as part of this application form is true and correct, and that:

- I am fully aware of my responsibilities in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"), the Environmental Impact Assessment ("EIA") Regulations, and any relevant Specific Environmental Management Act and that failure to comply with these requirements may constitute an offence in terms of relevant environmental legislation;
- I am aware of my general duty of care in terms of Section 28 of the NEMA;
- I am aware that it is an offence in terms of Section 24F of the NEMA should I commence with a listed activity prior to obtaining an Environmental Authorisation;
- I appointed the Environmental Assessment Practitioner ("EAP") (if not exempted from this requirement) which:
 - meets all the requirements in terms of Regulation 13 of the NEMA EIA Regulations; or
 - meets all the requirements other than the requirement to be independent in terms of Regulation 13 of the NEMA EIA Regulations, but a review EAP has been appointed who does meet all the requirements of Regulation 13 of the NEMA EIA Regulations;
- I will provide the EAP and any specialist, where applicable, and the Competent Authority with access to all information at my disposal that is relevant to the application;
- I will be responsible for the costs incurred in complying with the NEMA EIA Regulations and other environmental legislation including but not limited to –
 - costs incurred for the appointment of the EAP or any legitimately person contracted by the EAP;
 - costs in respect of any fee prescribed by the Minister or MEC in respect of the NEMA EIA Regulations;
 - Legitimate costs in respect of specialist(s) reviews; and
 - the provision of security to ensure compliance with applicable management and mitigation measures;
- I am responsible for complying with conditions that may be attached to any decision(s) issued by the Competent Authority, hereby indemnify, the government of the Republic, the Competent Authority and all its officers, agents and employees, from any liability arising out of the content of any report, any procedure or any action for which I or the EAP is responsible in terms of the NEMA EIA Regulations and any Specific Environmental Management Act.

Note: If acting in a representative capacity, a certified copy of the resolution or power of attorney must be attached.


Signature of the Applicant:

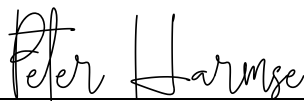
28. 07. 2025
Date:

Name of company (if applicable):

DECLARATION OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER ("EAP")

I **Peter Harmse**, EAP Registration number **2019/797** as the appointed EAP hereby declare/affirm the correctness of the:

- Information provided in this BAR and any other documents/reports submitted in support of this BAR;
- The inclusion of comments and inputs from stakeholders and I&APs;
- The inclusion of inputs and recommendations from the specialist reports where relevant; and
- Any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested and affected parties, and that:
- In terms of the general requirement to be independent:
 - o other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the activity or application and that there are no circumstances that may compromise my objectivity; or
 - o am not independent, but another EAP that meets the general requirements set out in Regulation 13 of NEMA EIA Regulations has been appointed to review my work (Note: a declaration by the review EAP must be submitted);
- In terms of the remainder of the general requirements for an EAP, am fully aware of and meet all of the requirements and that failure to comply with any the requirements may result in disqualification;
- I have disclosed, to the Applicant, the specialist (if any), the Competent Authority and registered interested and affected parties, all material information that have or may have the potential to influence the decision of the Competent Authority or the objectivity of any report, plan or document prepared or to be prepared as part of this application;
- I have ensured that information containing all relevant facts in respect of the application was distributed or was made available to registered interested and affected parties and that participation will be facilitated in such a manner that all interested and affected parties were provided with a reasonable opportunity to participate and to provide comments;
- I have ensured that the comments of all interested and affected parties were considered, recorded, responded to and submitted to the Competent Authority in respect of this application;
- I have ensured the inclusion of inputs and recommendations from the specialist reports in respect of the application, where relevant;
- I have kept a register of all interested and affected parties that participated in the public participation process; and
- I am aware that a false declaration is an offence in terms of Regulation 48 of the NEMA EIA Regulations;



Signature of the EAP:

Date: 30 July 2025

N/A

Name of company (if applicable):

DECLARATION OF THE SPECIALIST

Note: Duplicate this section where there is more than one specialist.

I, Christopher Nelson Cupido....., as the appointed Specialist hereby declare/affirm the correctness of the information provided or to be provided as part of the application, and that:

- In terms of the general requirement to be independent:
 - other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the development proposal or application and that there are no circumstances that may compromise my objectivity; or
 - am not independent, but another specialist (the "Review Specialist") that meets the general requirements set out in Regulation 13 of the NEMA EIA Regulations has been appointed to review my work (Note: a declaration by the review specialist must be submitted);
- In terms of the remainder of the general requirements for a specialist, have throughout this EIA process met all of the requirements;
- I have disclosed to the applicant, the EAP, the Review EAP (if applicable), the Department and I&APs all material information that has or may have the potential to influence the decision of the Department or the objectivity of any Report, plan or document prepared or to be prepared as part of the application; and
- I am aware that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations.

Signature of the EAP:



Date: 9 July 2025

KC Phyto Enterprises cc

Name of company (if applicable):

DECLARATION OF THE SPECIALIST

Note: Duplicate this section where there is more than one specialist.

I EARL HERDIER, as the appointed Specialist hereby declare/affirm the correctness of the information provided or to be provided as part of the application, and that:

- In terms of the general requirement to be independent:
 - other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the development proposal or application and that there are no circumstances that may compromise my objectivity; or
 - am not independent, but another specialist (the "Review Specialist") that meets the general requirements set out in Regulation 13 of the NEMA EIA Regulations has been appointed to review my work (Note: a declaration by the review specialist must be submitted);
- In terms of the remainder of the general requirements for a specialist, have throughout this EIA process met all of the requirements;
- I have disclosed to the applicant, the EAP, the Review EAP (if applicable), the Department and I&APs all material information that has or may have the potential to influence the decision of the Department or the objectivity of any Report, plan or document prepared or to be prepared as part of the application; and
- I am aware that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations.

Signature of the EAP:

Date:

Name of company (if applicable):